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# **FINAL**

## **Environmental Impact Statement**

### **Southern California Edison's West of Devers Upgrade Project**

BLM/CA/PL-2015/012+1793

DOI-BLM-CA-060-0015-0021

## **VOLUME 4**

### **Comments and Responses**

**U.S. Department of the Interior  
Bureau of Land Management**

**July 2016**

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**Table 1. Comments Received on the Draft EIR/EIS**

Letter No.	Date	Commenter
E21	9/10/15	Ron Roy
E22	9/10/15	Linda Hall
E23	9/11/15	Rodolfo N. & Yolanda M. Velasco
E24	9/11/15	Harry Smallwood
E25	9/11/15	Sharon Waitman
E26	9/11/15	Corinne Slusser
E27	9/5/15	Marcia Tulledge
E28	9/12/15	Fran Zimmerman
E29	9/18/15	David Doherty #1
E30	9/19/15	Udo Kierspe
E31	9/19/15	Kathie Dyson
E32	9/20/15	Timothy J. Pavlian
E33	9/21/15	W. Elaine Morgan
E34	9/23/15	Leanne Weisskoff
E35	9/17/15	Susan Diamond
E36	9/1/15	Ann C. Hasbargen
<b>Category F – The Applicant</b>		
F1-F4	9/22/15	Southern California Edison

## Purpose of Response to Comments Volume

The Final EIS includes the West of Devers Upgrade Project Draft EIR/EIS (August 2015) as revised, comments received on the Draft EIR/EIS, and responses to those comments. The Final EIS has been prepared pursuant to NEPA (42 U.S.C. § 4321 *et seq.*), CEQ Regulations (20 CFR Parts 1500-1508), and BLM's NEPA Handbook (H-1780-1). The Notice of Intent (NOI) to prepare an EIS was published in July 2014. Receiving and responding to comments on the Draft EIS is an essential part of the environmental review process, with comments and responses becoming part of the Final EIS. The Final EIS will be used by the BLM in its decision process, which will be documented in a Record of Decision (ROD) issued pursuant to NEPA.

Separately, the CPUC, as the Lead State Agency, published a Final EIR in December 2015, and will be responsible for ensuring compliance with all requirements of CEQA and any decision by the California Public Utility Commissioners, including any conditions of approval.

The BLM's Final EIS contains all comments on the Draft EIR/EIS and responses thereto. The focus of the responses to comments is on the disposition of environmental issues as raised in the comments, as specified by NEPA (40 CFR 1503.4). Where comments related only to CEQA, the responses from the CPUC are included in the EIS for information only; these are not considered BLM responses..

## Organization of this Volume.

The remainder of this volume is organized as follows:

- General Responses to Frequently Made Comments
- A: Comments by Agencies; Responses to Agency Comments
- B: Comments by Organizations; Responses to Organization Comments
- C: Comments by Native American Tribes; Responses to Native American Tribe Comments
- D: Comments Made at Public Workshops; Responses to Workshop Comments
- E: Comments by Members of the Public; Responses to Comments by Members of the Public
- F1: Comments by SCE (Cover Letter); Responses to SCE's Cover Letter Comments
- F2: Comments by SCE (Power Flow Modeling); Responses to SCE's Power Flow Modeling Comments
- F3: Comments by SCE (EIR/EIS Details); Responses to SCE's Detailed Comments
- F4: Comments by SCE (Project Description); Responses to SCE's Project Description Comments

## General Responses

This section presents detailed responses to comments that were made by many commenters. General Responses address the following topics:

- GR-1. Project Need
- GR-2. Agency-defined Basic Project Objectives
- GR-3. Renewable Energy Accommodated by the Phased Build Alternative
- GR-4. Analysis of Potential Future Construction under the Phased Build Alternative
- GR-5. Property Values
- GR-6. Electric and Magnetic Fields (EMF)

### GR-1. Project Need

Responding to comments from: SCE (Comment F1-1, F1-5, F1-13, and Comment F2-8); CAISO (Comment B9); Independent Energy Producers Association (Comment B7-1); and others.

Some commenters stated that one alternative, the Phased Build Alternative, may not meet or satisfy the need for the Proposed Project, and that the capacity of Phased Build Alternative may restrict development of renewable energy projects located electrically upstream of the WOD corridor in eastern Riverside County or Imperial County. In contrast, comments submitted by the CPUC Office of Ratepayer Advocates (ORA) stated that the EIR should consider an additional project alternative with a reduced capacity.

These comments reflect the positions of the various commenters on the need for the West of Devers Upgrade Project. The EIS presents SCE's Purpose and Need in Section A.2.1.1 and the BLM and CPUC Project Objectives in Section A.2.2.

This General Response focuses on the question of project need in the context of the environmental review process. The scope of the Final EIS is limited to satisfying the specific requirements of NEPA.

See General Response GR-2 and other individual responses to comments for discussions showing how the Phased Build Alternative would be a potentially feasible means of satisfying most or all of the objectives.

### **Projects Contributing to the Need for the Proposed Project and Connected Actions**

Various renewable energy projects and other electric transmission projects are planned to be developed in the area that would be served by transmission within the WOD corridor (primarily east of the Devers Substation). The level of renewable energy development that may be facilitated by the Proposed Project is addressed in the EIS for the limited purpose of disclosing environmental impacts that may occur at locations outside of the project corridor. A wide range of generation and transmission projects that contribute to the need for the Proposed Project appear in the EIS (Section A.2.1.4), and some projects will drive the need for the Proposed Project more than others (Table A-4, Projects Contributing to Need for WOD Upgrade Project). However, it is not appropriate for the EIS to attempt to define the overall level of need or to speculate on the level of development that must be accommodated.

The EIS, in Section B.7.1, Definition of Connected Action Projects, recognizes that some generation projects are so closely related to the Proposed Project as to be considered "connected actions" under NEPA. Accordingly, the environmental analysis discloses a range of potential impacts for the Connected Action projects because their construction and operation is directly reliant on the transmission capacity of the Proposed Project. The total generation capacity of the Connected Action projects is shown to be 1,474 MW (EIS Section A.3, Table A-6 and Table B-22).

### **GR-2. Agency-defined Basic Project Objectives**

**Responding to comments from:** SCE (Comment F1-1, F1-5, F1-7, F1-8, and Comment F2-8); CAISO (Comment B9-1, B9-3, B9-8); Palen Solar Holdings (Comment B4-1); and others.

Commenters stated that the Phased Build Alternative would not meet project objectives, and therefore it would not be a feasible alternative. Comments from owners of power generation projects, specifically Palen Solar Holdings (Comment Set B4), also assert that the agency-defined objectives should reflect SCE's proposal. This General Response focuses on the project objectives that are agency-defined for the environmental review process, and how the Phased Build Alternative is potentially feasible means of satisfying the objectives, with a focus on Basic Project Objective 1. Other individual responses to comments provide information on how the Phased Build Alternative would reduce or avoid environmental impacts.

This General Response reviews the requirement that an EIS evaluate a reasonable range of alternatives. It also explains how the BLM and CPUC established three "Basic Project Objectives" as a means of determining whether each alternative could accomplish most or all of basic the objectives.

#### ***Background on NEPA Requirements***

The Council on Environmental Quality's (CEQ's) NEPA Regulations (40 CFR 1502.14) requires analysis of alternatives. The Phased Build Alternative was developed and analyzed in the Draft EIR/EIS because it is potentially feasible, it substantially satisfies all three basic project objectives, and it would reduce or avoid certain environmental effects of the Proposed Project.

The CPUC and BLM developed the Basic Project Objectives for the purposes of environmental review, and more specifically, to ensure that the scope of alternatives was not unduly limited. The transmission alternatives originally identified by SCE in the October 2013 Proponent's Environmental Assessment (PEA) were limited to two minor route adjustments, one of which could have resulted in closure of the Banning Airport, and two major transmission system modifications that would have substantially more severe



environmental impacts than the Proposed Project (EIS Section C.5.6, Devers-Beaumont 500 kV Alternative, and Section C.5.7, Red Bluff–Valley-Serrano 500 kV Alternative). The Phased Build Alternative helps to constitute a reasonable range of potentially feasible alternatives designed to reduce the project’s environmental impacts.

### Rationale for the CPUC and BLM Basic Project Objectives

SCE’s PEA defined six project objectives, presented in EIS Section A.2.1. The reasons these objectives were modified are explained in Table GR-1, and in more detail following the table.

**Table GR-1. Agency-defined Basic Project Objectives and SCE Project Objectives**

SCE Objectives	EIS Basic Project Objectives
1. Allow SCE to meet its obligation to integrate and fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid.	<ul style="list-style-type: none"> <li>• <b>Retained</b> but modified as EIS Basic Project Objective 1 to specify a minimum level of deliverability driven by specific projects defined by CAISO in 2010.</li> </ul>
2. Consistent with prudent transmission planning, maximize the use of existing transmission line rights-of-way to the extent practicable.	<ul style="list-style-type: none"> <li>• <b>Retained</b> as EIS Basic Project Objective 3</li> </ul>
3. Meet project need while minimizing environmental impacts.	<ul style="list-style-type: none"> <li>• Eliminated because this is the purpose of both CEQA and NEPA; unnecessary to repeat this legal requirement</li> </ul>
4. Facilitate progress toward achieving California’s RPS goals in a timely and cost-effective manner by SCE and other California utilities.	<ul style="list-style-type: none"> <li>• <b>Retained</b> as EIS Basic Project Objective 2</li> </ul>
5. Comply with applicable Reliability Standards and Regional Business Practice developed by NERC, WECC, and the CAISO; and design and construct the project in conformance with SCE’s approved engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects.	<ul style="list-style-type: none"> <li>• Eliminated because the Lead Agencies could not permit a transmission project unless it did comply with the applicable safety requirements</li> </ul>
6. Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable.	<ul style="list-style-type: none"> <li>• Eliminated because these best construction management practices principles apply to all transmission projects approved by the Lead Agencies</li> </ul>

As shown in Table GR-1, the EIS establishes three “Basic Project Objectives” (taken from the six objectives defined by SCE) in order to define a range of reasonable alternatives (Draft EIR/EIS, Section A.2.3). The NEPA directs the BLM to “study, develop, and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources...” (NEPA Sec 102(2)(E)). When working with cooperating agencies, the range of alternatives may need to reflect the decision space and authority of other agencies, if decisions are being made by more than one agency. In determining the alternatives to be considered, the emphasis is on what is “reasonable” rather than on whether the proponent or applicant likes or is itself capable of implementing an alternative. “Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.” (Question 2a, CEQ, Forty Most Asked Questions Concerning CEQ’s NEPA Regulations, March 23,



1981). The CEQ regulations also direct that an EIS “...include reasonable alternatives not within the jurisdiction of the lead agency” (40 CFR 1502.14(c)).

To be sure that the scope of alternatives analyzed in the EIS was not unduly limited or narrow, the EIS uses a broader (agency-defined) view of the project objectives. This means that the EIS can and does consider alternatives that do not involve achieving precisely SCE’s level of targeted corridor transfer capability.

As shown in Table GR-1, the objectives listed by SCE in its PEA for the Proposed Project included no minimum generation level goals. (See also, EIS Section A.2.1.2). Similarly, SCE did not include minimum generation levels in its statement of Project Purpose and Need (EIS Section A.2.1.1). Because SCE did not define a minimum targeted capability for the corridor, the EIS Basic Project Objective 1 aligns with the assessment in 2010 by CAISO that the Proposed Project would be a required Delivery Network Upgrade for 2,200 MW from five renewable energy generation projects (EIS Section A.2.1.4.1). The Proposed Project was initiated by SCE as a result of the Transition Cluster Generation Interconnection study process in mid-2010. That study, based on CAISO queued generation projects and generation levels at the time, identified the West of Devers 220 kV system upgrades as necessary to support the deliverability of 2,200 MW of new generation in eastern Riverside County. Given no minimum level of generation to be accommodated by the project in SCE’s Project Purpose and Need (EIS Section A.2.1.1) or SCE’s Project Objectives (EIS Section A.2.1.2), the EIS Basic Project Objective 1 was set at the original 2,200 MW level. Detailed discussion of the consistency of the Phased Build Alternative with Basic Project Objective 1 is presented below.

Basic Project Objective 2 and Basic Project Objective 3 are qualitative in nature. The application submitted by SCE clearly established various objectives to “integrate and fully deliver” the output of generation projects and to facilitate progress toward achieving renewable energy goals. The EIS reflects the position of several commenters that increasing the capacity of the WOD transmission lines directly improves the ability for numerous renewable generation projects to interconnect (EIS Section A.2.3). Recognizing that the generation projects that plan to rely on the Proposed Project are primarily solar generation projects, Basic Project Objective 2 was established as a means of supporting access to renewable energy by increasing the capacity of the WOD transmission lines.

#### **Consistency with Basic Project Objective 1**

This response summarizes how the power flow analysis is used in the evaluation of the Phased Build Alternative and its capacity to attain Basic Project Objective 1. Other individual responses to comments provide information on the structural aspects of the alternative and details on the feasibility of construction and operation.

The ability of the Phased Build Alternative to meet Basic Project Objective 1 was confirmed with the power flow modeling presented in the EIS. The modeling analysis compared the SCE Proposed Project with the Phased Build Alternative in different power flow scenarios. The scenarios selected in the power flow modeling were posted by CAISO (EIS Appendix 5, Attachment 2), and all scenarios reflect at least 2,200 MW of generation that satisfies Basic Project Objective 1. The different scenarios were chosen by the EIS team as a means of reflecting executed Large Generator Interconnection Agreements (LGAs), CAISO feedback regarding generators still in the queue located electrically upstream of the corridor (CAISO Response to CPUC Data Request 1), and the changes in planned generation levels observed over the past 5 years (EIS Section A.2.1.4.1). The ZGlobal Power Flow Analysis identifies little change in the potential level generation since the original 2,200 MW that triggered the project in 2010 (EIS Appendix 5, Attachment 2).

Detailed data on the generation assumptions appear in the EIS (Table A4 of EIS Appendix 5, Attachment 2), and the generation table for the 2024 Reliability Base Case includes 3,853 MW of installed capacity at Red Bluff and Colorado River Substations. The EIS finds that the Phased Build Alternative satisfies the level of generation modeled with the Reliability Base Case (in the power flow analysis of Case #3 in EIS Appendix 5, Attachment 2). The EIS analysis does not include a formal study of deliverability. Conducting a comprehensive deliverability study in a manner consistent with the CAISO's deliverability study methodology is beyond the scope of the EIS, which focuses on determining whether the alternatives are feasible. Given this review of the potential levels of generation and by satisfying levels of generation in excess of 2,200 MW in the modeled scenarios, the Phased Build Alternative demonstrates consistency with Basic Project Objective 1.

### **GR-3. Renewable Energy Accommodated by the Phased Build Alternative**

**Responding to comments from:** SCE (Comment F1-1, F1-8, F1-9, F1-12, and Comment F2-10); Palen Solar Holdings (Comment B4-5, B4-6); Natural Resources Defense Council (Comment Set B5); and CAISO (Comment B9-2, B9-3, B9-13); and others.

Several commenters stated that the Phased Build Alternative would not properly support California's Renewable Portfolio Standard (RPS) goals. Specific comments from Palen Solar Holdings (Comment Set B4) claim that the EIS should provide an assurance that the Phased Build Alternative would not limit renewable energy development.

This General Response focuses on how renewable energy may be accommodated by the Phased Build Alternative with a focus on Basic Project Objective 2, and this General Response also addresses California's transmission planning process that occurs outside of, and separate from, the project-level environmental review process.

#### **Consistency with Basic Project Objective 2**

Basic Project Objective 2 states simply that alternatives should support achievement of State and federal renewable energy goals, by increasing the capacity of the transmission system in the WOD corridor. The EIS reviews the renewable energy projects that contribute to the need for the Proposed Project (EIS Table A-4, Projects Contributing to Need for WOD Upgrade Project). The EIS finds that the Phased Build Alternative would meet Basic Project Objective 2 because, by increasing transmission capacity from approximately 550 MW to about 3,000 MW, it would be supportive of achieving California's RPS goals.

The commenters disagree with the assessment of the Phased Build Alternative's compliance with Basic Project Objective 2. They assert that any alternative retained for analysis should fully accommodate the same level of renewable energy development that would be accommodated by the Proposed Project. These comments reflect an opinion that alternatives in the environmental review must precisely match the capabilities of the Proposed Project. Because the EIS does not define the overall level of need for the project, the EIS does not speculate on the level of development that must be accommodated. As described in General Response GR-1, the EIS discloses the level of renewable energy development that is likely to occur as connected actions as 1,474 MW (EIS Section A.3, Table A-6 and Section B, Table B-22).

#### **Transmission Planning Process as it Relates to Project-level Environmental Review**

Comments related to RPS compliance are based on the position that the agency-defined Basic Project Objectives in the EIS, and the Phased Build Alternative, do not reflect the portfolios of renewable energy resources that are used in the transmission planning process. These comments generally assert that the

Phased Build Alternative would not support meeting goals in excess of the 33 % RPS, which was the California standard for 2020 at the time of SCE's application filing and at the time the Draft EIR/EIS was published (August 2015). Some comments note and recognize that the Draft EIR/EIS analysis was prepared and released before a higher 50 % RPS delineated in Senate Bill 350 (the Clean Energy and Pollution Reduction Act of 2015, SB 350) became law, as it was signed by the Governor on October 7, 2015. The comments claim that the Draft EIR/EIS treatment of Basic Project Objective 2 does not align with the CAISO's and CPUC's processes for identifying and approving "public policy driven" transmission projects.

The CAISO's most-recent transmission plan, Board-approved on March 27, 2015, summarizes how portfolios of plausible renewable energy development are used as a means of the "least-regrets" transmission additions at the planning level, as follows:

*The ISO's transmission planning process has balanced the need for certainty by generation developers as to where this transmission will be developed with the planning uncertainty of where resources are likely to develop by creating a structure for considering a range of plausible generation development scenarios and identifying transmission elements needed to meet the state's 2020 RPS. Commonly known as a least regrets methodology, the portfolio approach allows the ISO to consider resource areas (both in-state and out-of-state) where generation build-out is most likely to occur, evaluate the need for transmission to deliver energy to the grid from these areas, and identify any additional transmission upgrades that are needed under one or more portfolios (CAISO 2014-2015 Transmission Plan, pp. 8-9).*

The CPUC's long-term procurement proceeding (LTPP) is the forum for developing the portfolios that are transmitted to CAISO for the transmission plan. While the CAISO transmission plan uses renewable energy portfolios that are developed through a CPUC planning-level proceeding, the transmission plan does not limit the CPUC from exploring project alternatives within the project-level environmental review. As described in General Response GR-1 (Project Need), each individual transmission element that is the subject of an application for a CPCN must be independently evaluated, and General Response GR-2 (Agency-defined Basic Project Objectives) shows that the scope of alternatives in the environmental review must not be unduly limited.

### **Renewable Energy Resources Portfolios in the Transmission Planning Process**

Since 2010, annual transmission planning in the jurisdiction of CPUC and CAISO has followed the collaborative "Revised CAISO Transmission Planning Process" (see CAISO letter, Comment Set B9). A Memorandum of Understanding (MOU) was signed by the CPUC and CAISO in May 2010 to formalize coordination between the Revised CAISO Transmission Planning Process and the CPUC's transmission siting, permitting and the long-term transmission planning processes. The MOU outlined how the CAISO considers and incorporates portfolios of generation scenarios from the CPUC's LTPP process in order to capture renewable energy growth consistent with state policies and 33 % RPS goals, as part of the annual CAISO Transmission Plan. The CPUC would then give substantial weight in its siting assessment to project applications that are consistent with the CAISO transmission plan. The 2010-2011 Transmission Planning Process and Transmission Plan, dated May 18, 2011, described this process and reflected the first cycle of CAISO's studies of "public policy driven" renewable resource portfolios and the necessary transmission.

The 2010-2011 Transmission Planning Process occurred after the CAISO made its initial identification and recommendation of the West of Devers Upgrade Project to accommodate 2,200 MW of interconnection requests. Therefore, the Proposed Project predates the first implementation of the Revised CAISO Transmission Planning Process that was established in 2010.

Because the West of Devers Upgrade Project was originally designed for the purpose of fulfilling certain LGIAs (as described in EIS Section A.2.1.4), the 2010-2011 Transmission Plan and subsequent CAISO Transmission Plans define the Proposed Project as a "base case" transmission addition. As a base case project, under the Revised CAISO Transmission Planning Process outlined in the May 2010 MOU, the Proposed Project did not appear to be identified by CAISO as a "specific needed transmission facility" for unconditional approval under the least-regrets principle<sup>1</sup> (Category 1 per the May 2010 MOU). Instead, the Proposed Project was incorporated as a base case project into the 2010-2011 Transmission Planning Process and subsequent plans. In contrast, the 2010-2011 Transmission Plan did specifically identify the Path 42 and Mirage-Devers Upgrades in conjunction with the WOD Interim Solution as "needed" under the least-regrets principle (Category 1). The 2013 West of Devers Interim Project (EIS Section B.1.1) was installed for the LGIAs, and the "policy-driven" Path 42 and Mirage-Devers Upgrade projects subsequently moved forward towards commercial operation.

Because the West of Devers Upgrade Project predated the Revised CAISO Transmission Planning Process described in the May 2010 MOU and the 2010-2011 Transmission Plan, the Proposed Project technically predates the ability to be formally categorized as a "policy-driven" transmission addition necessary for RPS. Given its origin as a transmission addition driven by LGIAs, the EIS team properly treated the Proposed Project as a "facility that may be needed depending on the course of future generation development" (Category 2 per the May 2010 MOU).

As noted above, Basic Project Objective 2 simply considers whether potential project alternatives would facilitate progress toward achieving renewable energy goals. The overall need to accommodate the full breadth of public policy-driven renewable energy portfolios is not defined in the EIS or with Basic Project Objective 2. The EIS team recognizes that each individual transmission element that is the subject of an application for a CPCN must be independently evaluated within the CPUC general proceeding, as discussed in General Response GR-1 (Project Need). In this context, the EIS team developed the Phased Build Alternative by focusing on the potential level of generation under development (see Basic Project Objective 1) and whether the alternative would facilitate an unspecified level renewable energy growth.

The Draft EIR/EIS does not evaluate whether the alternative is needed as a policy-driven transmission addition or whether it should accommodate some prescribed level of development beyond the basic project objectives in light of the CPUC's renewable energy portfolios. These determinations are appropriately explored in the CPUC General Proceeding. The CPUC evidentiary hearing for the Proposed Project allows all parties to address the topic of the need.

### **Achieving California's Future Renewable Energy Goals**

SCE filed its CPCN application on October 25, 2013. The CEQA Notice of Preparation (NOP) for the Draft EIR/EIS was published in May 2014 and the NEPA Notice of Intent (NOI) was published in July 2014. The analysis in the Draft EIR/EIS was focused on compliance with the 33% Renewable Portfolio Standard (RPS) that was in place at the time that the application and Draft EIR/EIS were prepared. However, since that time the state legislature and the Governor have implemented a higher RPS requirement. While the EIS focuses on the requirements in place at the time of the NOP/NOI, it appears useful to present a summary of the RPS and energy-saving components of the new law.

<sup>1</sup> The "least regrets principle" allows CAISO to find potential policy-driven solutions to identify those transmission elements that should be approved as Category 1 or Category 2 transmission elements. The May 2010 MOU states that the transmission plan "will distinguish between Category 1 facilities, which merit unconditional approval based on the concept of 'least regrets,' versus Category 2 facilities which may be needed depending on the course of future generation development."

On October 7, 2015, Governor Edmund G. Brown Jr. signed the Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350). With SB 350, California expanded the specific set of objectives to be achieved by 2030, with the following:

- To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
- To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

SCE and some other parties, notably Palen Solar Holdings, claim that major transmission system additions like the Proposed Project are the key to satisfying the California's renewable energy goals, and that future expanded transmission capacity is practically certain to be needed within the corridor. For example, SCE (Comment F1-16) states that the demand for more transmission infrastructure to meet these evolving State policy goals is "inevitable." However, it is not inevitable that the West of Devers corridor will be the focus of this future need for transmission. While the 33% RPS requirements have been a primary driver of the development of large solar projects in eastern Riverside County, a continuation of this same trend may not be the automatic result of SB 350. This law has broader energy requirements, and ties to other energy policy changes now underway.

Some examples of policy changes that will influence how California achieves future renewable energy goals are:

- SB 350 includes other provisions that broaden California's energy demand, placing a priority on energy efficiency and distributed generation resources. This implies that urban load centers may be able to reduce demand and distributed generation closer to load allows a reduced reliance on utility-scale renewables such as those being developed in eastern Riverside County.
- The CPUC's RPS Calculator (Version 6.1) indicates that other areas of California (e.g., Westlands Water District in the San Joaquin Valley, Solano County, etc.) can provide high value renewable energy potential in areas with existing transmission.
- Energy-only functionality embedded in RPS Calculator Version 6.1 allows prudent planning in moving away from the assumption that all renewable resources would seek "deliverability" through "Full Capacity Deliverability Status" (FCDS) contracts that have historically driven the need for bulk transmission system additions.
- A growing emphasis on Preferred Resources (i.e., mix of energy efficiency, demand response, renewable distributed generation, and energy storage), which can reduce the reliance on bulk transmission<sup>2</sup> — as evidenced by the SCE Preferred Resources Pilot (PRP) program described in SCE's Distribution Resources Plan filed with the CPUC on July 1, 2015.

#### GR-4. Analysis of Potential Future Construction under the Phased Build Alternative

**Responding to comments from:** SCE (Comment F1-12, F1-13, and Comment F2-9); CAISO (Comment B9-10).

<sup>2</sup> For example, as noted by CPUC President Picker (in R.14-08-013; 2/6/2015): "A significant component of the [distributed energy resources] net benefit calculation will be whether deeper penetration of DER in a particular location or on a specific feeder will be able to provide an alternative to the most costly upgrades of distribution (or eventually transmission) facilities that might otherwise be necessary to meet load. The deferral or avoidance of network upgrades may, in fact, offset much of the expected costs of accommodating new customer-side resources."



These comments similarly assert that the Draft EIR/EIS improperly excludes descriptions and impact analyses of potential future phases from the environmental analysis of the Phased Build Alternative. The comments also request additional information on the potential future construction that would further increase the capacity of the WOD corridor, and the potential additional environmental impacts that may result.

The EIS demonstrates that the Phased Build Alternative would adequately allow for future capacity expansion within the existing ROW, which could be achieved through additional reconductoring of newly constructed facilities and/or replacement of the retained double-circuit structures, if needed (EIS Appendix 5, Section 4.4). Although the EIS notes that the future capacity expansion of the corridor could occur with the Phased Build Alternative, this is not part of the description of this alternative because the need for such future expansion is not yet foreseeable. The EIS description of the Phased Build Alternative shows that it allows for the import of generation from all the reasonably foreseeable generation projects defined within the CAISO 2024 Reliability Base Case.

As discussed in BLM's NEPA Handbook (H-790-1, section 6.5.2.1), connected actions are those actions that are "closely related" and "should be discussed" in the same NEPA document (40 CFR 1508.25 (a)(1)). Actions are connected if they automatically trigger other actions that may require an EIS; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(i, ii, iii)). Connected actions are limited to actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions, but may need to be analyzed in cumulative effects analysis if they are reasonably foreseeable.

The EIS demonstrates, based on substantial evidence, that the need to expand the transmission capacity of the corridor is not currently a reasonably foreseeable consequence of the Proposed Project or any of its alternatives. This means that the EIS need not include environmental analysis of the potential impacts of such "future expansion" of the Phased Build Alternative because the need for such an expansion is not reasonably foreseeable at this time. The EIS fully discloses the environmental impacts of the Proposed Project because it is the project proposed by SCE and adequately describes and provides a comparative analysis of all project alternatives, including the Phased Build Alternative.

As noted in General Response GR-1 (Project Need), the EIS does not determine or define a specific level of need for the Proposed Project or any alternative to the project.

## **GR-5. Property Values**

**Responding to comments from:** Arrowhead Orthopaedics (Comment B3-3); Joe M. Rose (Comment E1-1); and David Doherty (Comment E29-4).

Several commenters expressed concerns about the effect of the Proposed Project and/or alternatives on property values. A discussion of impacts on property value can be found in Section D.8 (Socioeconomics and Environmental Justice), at Section D.8.3.3 (Impacts and Mitigation Measures). See in particular the discussion for Impact SE-5 (Construction of the project could adversely affect property values), where a review of pertinent literature on the subject is provided. The EIS analysis concludes that there are no definitive answers about whether and to what degree the presence of a transmission line may affect property value.

Under NEPA, effects on property value are a consideration as socioeconomic effects. Claims of diminished property value through decreased marketability are based on the reported concern about hazards to human health and safety and increased noise, traffic, and visual impacts associated with living in proximity to

unwanted land uses such as power plants, freeways, high voltage transmission lines, landfills, and hazardous waste sites.

Studies of the impact of power lines on property values have produced mixed findings. A recent publication, *Towers Turbines and Transmission Lines Impact on Property Value* (Bond, et al., 2013) provides a comprehensive review of decades of studies of high-voltage transmission lines, cell towers, and wind farms in various countries. In particular, Chapter 6 of the book reviews high-voltage overhead transmission line studies in North America. Although concerns may arise with regard to effects on the value of businesses or vacant land, the emphasis here is on residences.

Three possible effects have been claimed, singly or in combination, as potential contributors to reduced market value:

- **Diminished Price**, which is identified by comparing prices of units that are proximate to power lines with prices of similar and competitive properties more distant from power lines.
- **Increased Marketing Time** – Even when proximate properties sell at or near the same prices as more distant properties, claimants argue that proximate properties take longer to sell. Such increased marketing time can represent a loss to the seller by deferring receipt, availability, and use of sale proceeds.
- **Decreased Sales Volume** – A more subtle indicator of diminished property value if potential buyers decide not to buy in the impact area. A measurable decrease in sales volume in the impact area compared with sales volume in the control area where otherwise similar properties purportedly still are selling can represent evidence of decreased market value from proximity to the high voltage transmission lines (or claimed hazard).

A 2003 Electric Power Research Institute (EPRI) study, “Transmission Lines and Property Values: State of the Science,” stated that differences in location and time of data collection, as well as research design, make direct comparisons of results from the various studies very difficult. Although quantitative generalizations from studies cannot be reliably made, the following conclusions from studies seem to be similar across numerous studies:

- There is evidence that transmission lines have the potential to decrease nearby property values, but this decrease is usually small.
- Lots adjacent to the ROW often benefit, because they have open space next to them; lots next to adjacent lots often have value reduction.
- Higher-end properties are more likely to experience a reduction in selling price than lower-end properties.
- The degree of opposition to an upgrade project may affect size and duration of the sales-price effects.
- Setback distance, ROW landscaping, shielding of visual and aural effects, and integration of the ROW into the neighborhood can significantly reduce or eliminate the impact of transmission structures on sales prices.
- Although appreciation of property does not appear to be affected, proximity to a transmission line can sometimes result in increased selling times for adjacent properties.
- Sales-price effects are more complex than they have been portrayed in many studies. Even grouping adjacent properties may obscure results.
- Effects of a transmission line on sales prices of properties diminish over time and all but disappear in five years.

- Opinion surveys of property values and transmission lines may not necessarily overstate negative attitudes, but they understate or ignore positive attitudes.
- The release of findings from the Swedish study on EMF and health effects had no measurable influence on sales prices.

As discussed above, concerns regarding effect on property values typically result from visual impacts, or health and safety concerns such as EMF. Implementation of mitigation measures in Section D.18 (Visual Resources), such as Mitigation Measures VR-9a (Treat structure surfaces) would reduce the visual impacts of the project by reducing contrast and reflectance. Also, if adopted, the Phased Build Alternative and the Tower Relocation Alternative would locate certain transmission structures in Segments 4, 5, and 6 of the project farther from existing homes than would be the case under the Proposed Project. In addition, the CPUC has implemented a decision requiring utilities to incorporate “low-cost” or “no-cost” measures for managing EMF from power lines. These measures for mitigation of magnetic fields would be incorporated into the Proposed Project and may help to reduce perceived health effects of transmission lines that would adversely affect property values.

## **GR-6: Electric and Magnetic Fields (EMF)**

**Responding to comments from:** Arrowhead Orthopaedics (Comment B03-2); Joe M. Rose (Comment E01-1); Michael Gilbert (Comment E10-1).

Commenters were concerned about the public health effects of EMF from transmission lines as they relate to the Proposed Project and alternatives. The EIS addresses EMF in Section B.5 (Electric and Magnetic Fields Management) as it pertains to 220 kV transmission and 66 kV subtransmission lines. SCE’s EMF Field Management Plan is included in Appendix 4 of the EIS. This response includes the following topics:

- Approach to EMF Assessment and Studies about EMF Health Impacts
- Levels of EMF Exposure
- Methods to Reduce Magnetic Fields

### **Approach to EMF Assessment and Studies about EMF Health Impacts**

The BLM recognizes that there is a great deal of public interest and concern regarding potential health effects from exposure to electric and magnetic fields (“EMF”) from power lines. To address public concerns about EMF, the EIS provides information regarding EMF associated with electric utility facilities and the potential effects of the Proposed Project and the Alternatives related to public health and safety. Section B.5.1 of the EIS summarizes the results of scientific review panels that have considered the body of EMF health effects research. As the EIS explains, potential health effects from exposure to electric fields from power lines is typically not of concern since electric fields are effectively shielded by materials such as trees, walls, etc. Therefore, the information in Section B.5 of the EIS related to EMF focuses primarily on exposure to magnetic fields from power lines. However it does not consider magnetic fields in the context of NEPA, or the determination of environmental impacts. This is because there is no agreement among scientists whether exposure to EMF creates a potential health risk and because there are no defined or adopted NEPA standards for defining health risk from EMF. The correlation between proximity to high voltage power lines and increased leukemia and other cancer rates has been found to be true in some scientific studies and is supported by anecdotal evidence, but has not been found to be true in other



studies nor has it been proven in laboratory experiments.<sup>3</sup> As a result, EMF information is presented in response to public interest and concern. Disclosure of such information is consistent with the EIS's role as "an informational document." (42 U.S.C. § 4321.)

For more than 20 years, questions have been asked regarding the potential effects within the environment of EMFs from power lines. Early studies focused primarily on interactions with the electric fields from power lines. In the late 1970s, the subject of magnetic field interactions began to receive additional public attention and research levels increased. A substantial amount of research into the health impacts of electric and magnetic fields has been conducted over the past several decades; however, much of the body of national and international research regarding EMF and public health risks remains contradictory and inconclusive.

### Levels of EMF Exposure

Sections B.5.2 and B.5.3 of the EIS presents the existing and estimated EMF levels from SCE's Proposed Project. For the existing overhead 220 kV line configuration, magnetic fields are shown as ranging from 22.3 to 75.0 milliGauss (mG) on the west or north edge of the ROW and from 21.0 to 72.6 mG on the east or south edge of the ROW. For the proposed overhead 220 kV line configuration with phasing and increased conductor heights, magnetic fields are shown as ranging from 0.4 to 56.1 mG on the west or north edge of the ROW and from 2.2 to 68.6 mG on the east or south edge of the ROW. Tables B-18 and B-19 show the existing and estimated magnetic field levels along the corridor, respectively.

The public routinely experiences exposure to EMF in the community from sources other than electric transmission lines and substations. Research on ambient magnetic fields in homes and buildings in several western states found average magnetic field levels within most rooms to be approximately 1 mG, while in a room with appliances present, the measured values ranged from 9 to 20 mG (Severson et al., 1988, and Silva, 1988). Immediately adjacent to appliances (within 12 inches), field values are much higher and can range from 3 to 20,000 mG.

Outside of the home, the public also experiences EMF exposure from the electric distribution system that is located throughout all areas of the community. Estimates of the magnetic field exposures to the public from overhead 12.5 kV distribution lines range from 22mG directly below the lines, to 8 mG at 40 feet from the lines, and 2 mG at 100 feet from the lines. In areas of underground distribution, which typically occurs in residential areas, the 12.5 kV circuits are not buried as deeply as transmission lines, and are not arranged to optimize field cancellation. The estimated fields for underground distribution lines range from 31 mG directly above the line, 4 mG 40 feet from the line, and 1.9 mG 100 feet from the line.<sup>4</sup>

### Methods to Reduce Magnetic Fields

As discussed in Section B.5.1 of the EIS, magnetic fields can be reduced either by cancellation or by increasing distance from the source. Cancellation is achieved in two ways. A transmission line circuit consists of three "phases": three separate wires (conductors) on a transmission tower. The configuration of these three conductors can reduce magnetic fields. First, when the configuration places the three conductors closer together, the interference, or cancellation, of the fields from each wire is enhanced. This technique has practical limitations because of the potential for short circuits if the wires are placed too close together. There are also worker safety issues to consider if spacing is reduced. Second, in instances where

<sup>3</sup> Rob Smerling, Harvard Health Publications. *Power lines and your health*. 2008. <http://health.msn.com/health-topics/cancer/articlepage.aspx?cp-documentid=100202335&page=2>. May 2008.

<sup>4</sup> Washington State Department of Health. *Electric and Magnetic Field Reduction: Research Needs*. January, 1992.

there are two circuits (more than three phase wires), such as in most 220 kV portions of the Proposed Project, cancellation can be accomplished by arranging phase wires from the different circuits near each other. In underground lines, the three phases are typically much closer together than in overhead lines because the cables are insulated (coated), but field cancellation still occurs.

The distance between the source of fields and the public can be increased by either placing the wires higher aboveground, burying underground cables deeper, or by increasing the width of the ROW. For transmission lines, these methods can prove effective in reducing fields because the reduction of the field strength drops rapidly with distance.

#### **SCE's Proposed EMF Mitigation**

In accordance with CPUC Decisions D.93-11-013 and D.06-01-042, SCE evaluated "no-cost" and "low-cost" magnetic field reduction steps for the proposed transmission and substation facilities for facilities requiring certification under General Order 131-D.<sup>5</sup> EIS Appendix 4 (Field Management Plan) presents details of the EMF Plan proposed by SCE. Specific measures to reduce EMF which SCE has proposed in its plan for inclusion in the Proposed Project are summarized below:

- Utilize subtransmission structure heights that meet or exceed SCE's EMF preferred design criteria,
- Utilize underground subtransmission construction for crossing other transmission structures and other engineering reasons,
- Utilize double-circuit construction that reduces spacing between circuits as compared with single-circuit construction,
- Utilize taller structure heights or increased conductor ground clearance where the proposed transmission lines run adjacent to populated areas, and
- Arrange conductors of the proposed transmission lines for magnetic field reduction ("phasing").

Final engineering and selection of the alignment of the line would include seeking opportunities to strategically place the line farther from sensitive land uses, where feasible.

Additional information regarding EMF and Proposed Project can be found in Appendix B of SCE's CPN application (A.13-10-020).

Information on the West of Devers Transmission Upgrade Project (CACA-055285) is available on the project website at:

<http://www.blm.gov/ca/st/en/fo/palmsprings/transmission/WestOfDeversProject.html>

SCE's CPN application and Proponent's Environmental Assessment are available for public review at the CPUC Energy Division CEQA Unit and on the project website at:

<http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm>

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<sup>5</sup> General Order 131-D, *op. cit.*

Comment Set A1 – San Bernardino County Department of Public Works



825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.8109 Fax: 909.387.7876

[www.sbcounty.gov](http://www.sbcounty.gov)

Department of Public Works

Environmental & Construction • Flood Control  
Operations • Solid Waste Management  
Surveyor • Transportation

Gerry Newcombe  
Director

September 16, 2015

File: 10(ENV)-4.01

Billie Blanchard (CPUC Project Manager)  
California Public Utilities Commission & Bureau of Land Management  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA. 94104-3002  
[westofdevers@aspeneq.com](mailto:westofdevers@aspeneq.com)

RE: CEQA/NEPA – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT  
REPORT/DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE WEST OF DEVERS  
UPGRADE PROJECT FOR THE CALIFORNIA PUBLIC UTILITIES COMMISSION

Dear Mr. Blanchard:

Thank you for giving San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. We received this request on August 11, 2015 and pursuant to our review, the following comments are provided:

A1-1

Environmental Management Division (Marc Rodabaugh, Stormwater Program Manager, 909-387-8112):

1. While SCE is explicit in its intention to implement a SWPPP to address potential water quality impacts during construction, they neglect to address the Construction General Permit's requirements for permanent post-construction BMPs. This needs to be addressed. In addition, SCE must evaluate NPDES MS4 Phase I and II requirements for post-construction BMPs. In San Bernardino and Riverside Counties, it may be necessary to prepare Water Quality Management Plans for those portions of the project (facilities, paved areas and/or roadways) where new impervious areas are created, or existing impervious areas are replaced. SCE must consult with the appropriate municipal jurisdiction (City or County) to determine the applicability of these plans.

Traffic Division (Eloy Ruvalcaba, PWE III, 909-387-1869):

A1-2

1. It appears by the Draft EIR that Reche Canyon Road between Prado Lane and Westwood Street, which is currently maintained by County of San Bernardino Department of Public Works, may be impacted by the overhead construction of Segment 2 of this project. For temporary road or traffic lane closure along this segment of Reche Canyon Road due to construction activities, a road permit must be obtained from County of San Bernardino Department of Public Works – Road Permit Section.

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**Comment Set A1 – San Bernardino County Department of Public Works (cont.)**

B. Blanchard, CPUC, CEQA/NEPA NOA Devers upgrade Project  
September 16, 2015  
Page 2 of 2

2. Prior to the start of construction, the Traffic Control Plans for Segment 2 of this project in particular for Reche Canyon Road must be reviewed by County of San Bernardino Department of Public Works – Road Permit Section. A1-3

3. Page D.16-7, Table D.16.1.2.3, Segment 3 (San Timoteo Canyon): Palomares Road and Smiley/Lisa Marie Ln are not maintained by County of San Bernardino Department of Public Works. It appears that these roads are under the City of Redlands jurisdiction. Please verify with the City. A1-4

4. Please clarify if there is going to be any long-term road closures during construction of this project. A1-5

**Transportation Planning Division (Jinghui Bradley, PWE III, 909-387-8173):**

1. Under impact T-4 on Page D.16-19: in addition to Caltrans special permits, moving permits from affected local agencies for loads exceeding legal weight and size limits on local roads will also be required. A1-6

2. Under T-4a on Page D.16-19:  
a. Entire road used by the construction activities, instead of just 500 feet in each direction of project access points, should be covered. A1-7

b. In addition to repair roads to pre-construction condition after major construction, SCE should pay affected public agency for extra maintenance costs during the construction. A1-8

If you have any questions, please contact the individuals who provided the specific comment, as listed above.

Sincerely,



**NIDHAM ARAM ALRAYES, MSCE, PE, QSD/P**  
Public Works Engineer III  
Environmental Management

NAA:PE:sr/CEQAComment\_CPUC\_DEIR\_WestofDeversUpgrade\_2015-09-16-01.docx

## Responses to Comment Set A1 – San Bernardino County Department of Public Works

- A1-1 The commenter would like the Construction General Permit's requirements for permanent post-construction BMPs to be identified, and to have SCE refer to NPDES MS4 Phase I and II requirements for post-construction BMPs. Water Quality Management Plans may be necessary for those portions of the project where new impervious areas are created or replaced, and the appropriate municipal jurisdiction should be consulted to discuss the applicability of these plans.

Section D.19.2.1 (Water Resources and Hydrology, Applicable Regulations, Plans, and Standards, Federal) describing Federal Regulations, has been modified to include reference to post-construction BMPs in the Construction General Permit. Mitigation Measure WR-3a, requiring implementation of flood, erosion, and scour protection for aboveground and belowground improvements, has been modified to include reference to the MS4 requirements and preparation of Water Quality Management Plans. The discussion of Impact WR-4, describing potential water quality degradation, has been modified to include a discussion of the modified Mitigation Measure WR-3a.

- A1-2 This comment notes the possibility of temporary road or lane closures on Reche Canyon Road for construction activity and that a road permit must be obtained.

SCE will be required to coordinate all road and lane closures with the agency having jurisdiction over an affected road. This is addressed in Section D.16.3.3 (Transportation and Traffic, Impacts and Mitigation Measures) by Mitigation Measure T-1b (Prepare Traffic Control Plans). Section A.4.4 (Permits Required for the Proposed Project) in the EIS discusses permits or approvals from other federal, tribal, State or regional, and local agencies that may be needed for the project, including road permits from San Bernardino County (see Table A-7, Permits that May Be Required for the West of Devers Upgrade Project).

- A1-3 The commenter states that prior to construction, Traffic Control Plans must be reviewed by the County Department of Public Works.

This requirement is addressed by Mitigation Measure T-1b; see Response to Comment A1-2.

- A1-4 The commenter identified two roads not under its jurisdiction. Table D.16-6 (Public Roadways along the Proposed Route – Segment 3: San Timoteo Canyon) has been amended to indicate the correct jurisdiction for Palomares Road and Smiley Road/Lisa Marie Lane is the City of Redlands, not San Bernardino County.

- A1-5 The commenter requests clarification as to whether there will be long-term road closures for the project in San Bernardino County.

There are no planned long-term closures. The Proposed Project would not install any 220 kV transmission lines underground in roads or elsewhere. Except as noted below, most project work at or near roads would be overhead, with limited-duration closures, such as for stringing conductor across roads. The Proposed Project and some project alternatives include underground segments of various distribution, subtransmission, and communications lines. However, where these activities occur in roads, only short term lane closures and traffic controls would be required. The length of time for these activities would be similar to any underground utility installation requiring trenching (or directional drilling), placement of the utility infrastructure, and backfilling and repair of the disturbed area.

Furthermore, Section B.3.1.5 (Traffic Control) of the EIS states that construction activities completed within public-street ROWs would require the use of a traffic control service, and any lane closures would be conducted consistent with local ordinances and ministerial city permit conditions. These traffic control measures would be consistent with those published in the California Joint Utility Traffic Control Manual.

- A1-6 The commenter notes that local road permits for over-weight and over-sized loads on local roads would be required.

Impact T-4 (Construction vehicles and equipment would potentially damage roads in the project area) in Section D.16.3.3 (Impacts and Mitigation Measures) has been amended to acknowledge the requirement for local permits for exceeding legal weight and size limits on local roads, in addition to any Caltrans required permits.

- A1-7 The commenter suggests that the “entire road used by the construction activities” should be covered by Mitigation Measure T-4a, instead of 500 feet in each direction of access points, as stated in the mitigation measure.

In Section D.16.3.3 (Impacts and Mitigation Measures), Mitigation Measure T-4a (Repair roadways damaged by construction activities) has been amended to include an additional requirement that prior to construction road surface conditions be documented in areas where trenching or digging in a roadway would occur. The request that the “entire road used by the construction activities” be documented is overly broad and unwieldy, as construction vehicles could legally use many roads throughout the region in transiting between their points of origin and individual construction sites. Wear and tear from general construction traffic use of regional roads would be impossible to distinguish from wear and tear caused by all other vehicles using the roads. The mitigation measure, as amended, would adequately account for any damage near entrances to off-road construction areas and as well as where the road surface would be damaged by trenching.

- A1-8 The commenter suggests that in addition to post-construction road repair, SCE should pay for “extra maintenance costs during the construction.”

Such a requirement is overly broad and would be exceedingly difficult to implement reasonably. It would require defining what constitutes “extra maintenance cost” as opposed to general maintenance, and what part of such cost would be attributed to the project as compared to other users of the roadway. The intention of Mitigation Measure T-4a (Repair roadways damaged by construction activities) is to document preconstruction conditions as described in the measure and to ensure that, following construction, the roadway is repaired to pre-construction conditions. This comment has not resulted in a change to the EIS.

Comment Set A2 – U.S. Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94014

SEP 18 2015

Subject: Draft Environmental Impact Statement/Environmental Impact Report for Southern California Edison's Proposed West of Devers Upgrade Project, Riverside and San Bernardino Counties, CA (CEQ#20150212)

Dear Mr. McMenimen:

The U.S. Environmental Protection Agency has reviewed the Joint Draft Environmental Impact Statement/Environmental Impact Report for Southern California Edison's Proposed West of Devers Upgrade Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under § 309 of the Clean Air Act.

Based on our review, we have rated all three of the alternatives analyzed in the Draft EIS/EIR as *Lack of Objections* (LO). Please see the enclosed "Summary of EPA Rating Definitions." To assist in providing improved analyses and additional disclosure in the Final EIS, our detailed comments include recommendations to ensure compliance with Clean Water Act Section 404 and EPA's general conformity regulations. The EPA understands that final engineering and design of the transmission line upgrade depends on selection of a preferred route, which has not been decided. Based on the information presented in the DEIS/EIR and our understanding that the transmission line would utilize the existing row for most of the upgrade, we anticipate that the environmental impacts would be limited; however, we recommend that the Final EIS include the results of a screening level analysis of impacts to waters of the U.S., as well as further information about the project's compliance with Clean Air Act general conformity requirements. The EPA also recommends selection of the phased build alternative and seasonal use of helicopters to minimize air quality impacts, in light of the non-attainment status for ozone in the South Coast Air Quality Management District.

We appreciate the opportunity to review this Draft EIS/EIR and are available to discuss our comments. Please send a hard copy of the Final EIS/EIR to this office (Mail Code: ENF-4-2) when it is officially filed with EPA's electronic EIS submittal tool: e-NEPA. If you have any questions, please contact me at (415) 972-3521, or contact Scott Sysum, the lead reviewer for this project, at (415) 972-3742 or [sysum.scott@epa.gov](mailto:sysum.scott@epa.gov).

Sincerely,

Kathleen Martyn Goforth, Manager  
Environmental Review Section

Enclosures:

- (1) Summary of EPA Rating Definitions
- (2) EPA's Detailed Comments

A2-1

A2-2



**Comment Set A2 – U.S. Environmental Protection Agency (cont.)**

**SUMMARY OF EPA RATING DEFINITIONS\***

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement.

**ENVIRONMENTAL IMPACT OF THE ACTION**

***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. The EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality.

**ADEQUACY OF THE IMPACT STATEMENT**

***Category "1" (Adequate)***

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

***Category "2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

***Category "3" (Inadequate)***

The EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.



Comment Set A2 – U.S. Environmental Protection Agency (cont.)

US EPA DETAILED COMMENTS ON THE JOINT DRAFT ENVIRONMENTAL IMPACT STATEMENT/  
ENVIRONMENTAL IMPACT REPORT FOR SOUTHERN CALIFORNIA EDISON'S PROPOSED WEST OF  
DEVERS UPGRADE PROJECT, RIVERSIDE AND SAN BERNARDINO COUNTIES, CA, SEPTEMBER 18, 2015

Aquatic Resources

*Geographic Extent of Waters of the United States and Section 404(b)(1) Guidelines*

Pursuant to Section 404 of the Clean Water Act, discharge of dredged or fill material to waters of the United States requires a permit issued by the U.S. Army Corps of Engineers. According to the Draft EIS/EIR, the proponent's Environmental Assessment contained a drainage assessment that makes a preliminary assessment of WUS potentially affected by the project (p. D.19-14). The extent of direct and indirect impacts to WUS cannot be determined without completion of a jurisdictional delineation. This information is necessary in order to ensure that, if a permit is required, only the Least Environmentally Damaging Practicable Alternative is authorized by the U.S. Army Corps of Engineers, as required by the Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials (40 CFR 230) (Guidelines), promulgated pursuant to Section 404(b)(1) of the Clean Water Act.

Given the scale and nature of the action, a planning level assessment of aquatic resources would help identify the environmentally preferable alternative. Such an assessment includes utilization of existing water resource data contained in the National Hydrography Dataset, National Wetland Inventory, USGS topographic maps and high resolution digital photography, as well as necessary field checking of the alternatives. Once the environmentally preferable alternative is identified, a jurisdictional delineation should be conducted prior to final design of the selected transmission line alignment. With a jurisdictional delineation, the applicant can use the design flexibility inherent in transmission line design (e.g., adjust tower placement and access roads) to demonstrate that the alignment is the LEDPA, in compliance with the Guidelines.

*Recommendations:*

Discuss, in the Final EIS, how the project will comply with the CWA Section 404 (b)(1) Guidelines.

Complete a planning level assessment for potential impacts to WUS prior to issuance of the Final EIS/EIR. Include, in the Final EIS/EIR, estimated acreage impacts to WUS based on the planning level assessment for each alternative.

Include, in the Final EIS, additional measures to further minimize impacts to aquatic resources, as appropriate, such as reducing the width of access roads, constructing bridges over WUS and including buffers to minimize indirect impacts to aquatic resources.

*Ephemeral Washes and Other Aquatic Resources*

Regardless of their jurisdictional status, natural ephemeral washes perform a diversity of hydrologic and biogeochemical functions that directly affect the integrity and functional condition of higher-order

A2-3

A2-4

A2-5

A2-6

Comment Set A2 – U.S. Environmental Protection Agency (cont.)

waters downstream. Healthy ephemeral waters with characteristic plant communities control rates of sediment deposition and dissipate the energy associated with flood flows. Ephemeral washes also provide habitat for breeding, shelter, foraging, and movement of wildlife. Many plant populations are dependent on these aquatic ecosystems and adapted to their unique conditions. Potential damage that could result from disturbance of flat-bottomed washes includes alterations to the hydrological functions that natural channels provide in arid ecosystems: adequate capacity for flood control, energy dissipation, and sediment movement, as well as impacts to valuable habitat for desert species.

A2-6  
cont.

*Recommendations:*

Quantify, in the Final EIS/EIR, the likely impacts to ephemeral waters from the proposed project, for each project alternative, and discuss potential mitigation.

Commit, in the Final EIS/EIR, to avoiding, to the greatest extent feasible, or minimizing direct and indirect impacts to ephemeral streams (such as erosion, migration of channels, and local scour).

Air Quality

A2-7

*General Conformity*

Section 176(c)(1) of the Clean Air Act requires Federal agencies to assure that their actions conform to applicable implementation plans for achieving and maintaining the National Ambient Air Quality Standards for criteria pollutants. Also, this section assigns primary oversight responsibility for conformity assurance to the agencies themselves, not to the Environmental Protection Agency or the States. Specifically, for there to be conformity, a Federal action must not contribute to new violations of standards for ambient air quality, increase the frequency or severity of existing violations, or delay timely attainment of standards in the area of concern (e.g., a State or a smaller air quality region).

According to EPA's regulations, the conformity determination applies only to the Federal action, which, in this case, pertains to activities occurring on federal land. Emissions from the portion of the project that would occur on nonfederal land could, however, be considered indirect emissions resulting from the Federal action.<sup>1</sup> The DEIS excludes those emissions from its conformity determination, but does not provide the rationale for doing so.

On page D.3-12 of the Draft EIS/EIR, Table D.3-7 is titled, "Construction-Phase Emissions and General Conformity (average tons per year)". Per EPA regulations, the general conformity de minimis levels apply to each year of the project, not the average tons per year of emissions.<sup>2</sup>

<sup>1</sup> For general conformity, EPA has defined the indirect emissions at 40 CFR 93.152

<sup>2</sup> See 40 CFR 93.153 (b) and page 25 of EPA's General Conformity Training Module  
<[http://www.epa.gov/airquality/genconform/training/files/General\\_Conformity\\_Training\\_Manual.pdf](http://www.epa.gov/airquality/genconform/training/files/General_Conformity_Training_Manual.pdf)>

**Comment Set A2 – U.S. Environmental Protection Agency (cont.)**

On page D.3-6, under the discussion of general conformity, the Draft EIS/EIR discusses regionally significant actions. Regionally significant action regulations have been removed from the general conformity regulations (75 FR 17254, April 5, 2010).

A2-7  
cont.

*Recommendations:*

Provide, in the Final EIS/EIR, the rationale for excluding from the conformity analysis the emissions from the nonfederal portion of the project (e.g., BLM has no practical control or continuing program authority).

Include, in the Final EIS/EIR, an emissions estimate for each year of the project. It is allowable to estimate emissions for the year representing the maximum over the entire Federal action, if all years are de minimis, and provide a brief explanation of the reason the particular year represents the maximum emissions.

A2-8

Remove, in the Final EIS/EIR, the discussion on p. D.3-6 regarding regionally significant actions.

A2-9

*Helicopter Emissions*

The South Coast Air Quality Management District's Final 2012 Air Quality Management Plan states that, in the South Coast Air Basin, high concentrations of ozone are normally recorded during the late spring and summer months, when more intense sunlight drives enhanced photochemical reactions. High PM<sub>10</sub> and PM<sub>2.5</sub> concentrations can occur throughout the year, but occur most frequently in fall and winter in the Basin. Although there are changes in emissions by season, the observed variations in pollutant concentrations are largely a result of seasonal differences in weather conditions.<sup>3</sup> The plan also states that the ozone standard was exceeded most frequently in the Central San Bernardino Mountains. Ozone exceedances extended through San Bernardino and Riverside County valleys in the eastern Basin, as well as the northeast and northwest portions of Los Angeles County in the foothill and valley areas.

A2-10

The Draft EIS/EIR states that in some cases, towers and poles do not have existing access roads and are accessed on foot, by helicopter, or by creating temporary access areas. Operation and Maintenance related helicopter activities could include transportation of transmission line workers, delivery of equipment and materials to structure sites, structure placement, hardware installation, and conductor or Optical Ground Wire stringing operations. Helicopter landing areas could occur where access by road is infeasible (p. B-54).

*Recommendations:*

Consider, in the Final EIS/EIR, minimizing helicopter construction during the spring and summer months and discuss the feasibility of scheduling the heaviest helicopter use during the fall and winter when ozone production is the lowest. Quantify the potential benefits to air quality and discuss whether impacts to other resources could result from construction during cooler, and potentially wetter, months.

<sup>3</sup> Final 2012 Air Quality Management Plan, South Coast Air Quality Management District.

**Comment Set A2 – U.S. Environmental Protection Agency (cont.)**

In the Final EIS/EIR, identify and commit to using the best available control technologies to reduce helicopter emissions.

A2-11

Climate Change

The DEIS/EIR includes quantification and a thorough analysis of greenhouse gas emissions, including those of sulfur hexafluoride (SF<sub>6</sub>). The EPA believes that the Council on Environmental Quality's December 2014 revised draft guidance for Federal agencies' consideration of GHG emissions and climate change impacts in NEPA outlines a reasonable approach, and should be consulted to help frame the analysis of these issues in the Final EIS.

A2-12

*Recommendations:*

In the Final EIS, qualitatively describe relevant climate change impacts, and analyze practicable mitigation measures to reduce project-related GHG emissions. Consider whether any modifications to the design would be appropriate to facilitate GHG emission reductions or improve resilience to foreseeable climate change; for example, increased transmission line height to avoid sagging under higher temperature conditions.

## Responses to Comment Set A2 – U.S. Environmental Protection Agency

A2-1 The commenter asks that the Final EIS include the results of a screening level analysis of impacts to waters of the U.S.

This issue is addressed in Section D.4.1.1 (Biological Resources – Vegetation, Regional Setting and Approach to Data Collection) and in Section D.4.3.3 under Impact VEG-3 relating to impacts to jurisdictional waters. SCE has not completed a delineation of jurisdictional waters for the Proposed Project, but has prepared a “Drainage Assessment” as preliminary information related to potential jurisdictional waters to support project design. The Drainage Assessment estimates maximum potential permanent and temporary impacts to jurisdictional drainage features by linear feet and acreage of riparian vegetation. These estimates are shown in Tables D.4-5 (Maximum Potential Permanent Impacts to Jurisdictional Drainage Features) and D.4-6 (Maximum Potential Temporary Impacts to Jurisdictional Drainage Features). The Drainage Assessment estimates that approximately 26 of the drainage features have potential to meet federal wetland criteria. The drainage assessment is conservative, estimating maximum disturbance to jurisdictional features. Not all jurisdictional waters within the ROW or the Proposed Project study area would be affected by the Proposed Project.

A2-2 The commenter asks that the Final EIS include “further information about the project’s compliance with federal Clean Air Act general conformity requirements.” The commenter also recommends selection of the Phased Build Alternative and seasonal use of helicopters to minimize air quality impacts.

The Clean Air Act general conformity rule is described in Section D.3.2.1 (Air Quality, Applicable Regulations, Plans, and Standards, Federal). Only a small fraction of project activity would occur on federal lands, and the emissions attributable to the federal portions of the Proposed Project would be less than the applicability thresholds in the general conformity rule (Table D.3-7, Construction-Phase Emissions and General Conformity). As explained in Section D.3.3.3 (Impacts and Mitigation Measures), under Impact AQ-1 (Construction would generate dust and exhaust emission of criteria pollutants), the Proposed Project is exempt from the requirement that a comprehensive Air Quality Conformity Analysis be performed. Under Impact AQ-3 (Operation, maintenance, and inspections would generate dust and exhaust emissions), it was also determined that annual emissions would not likely exceed federal General Conformity thresholds, and no general conformity determination would be required.

The recommendation for the Phased Build Alternative is noted. The extent to which helicopters would be employed in construction of the Proposed Project is unknown. Final determination on construction methods for various tower structures and for conductor stringing will be on a case-by-case basis by SCE and/or its contractor. In Section D.3.3.3 (Air Quality, Impacts and Mitigation), Mitigation Measure AQ-1c (Control helicopter emissions) identifies measures to reduce emissions and fugitive dust from such activities.

A2-3 The commenter asks that the Final EIS discuss how the project will comply with CWA Section 404 (b)(1) Guidelines.

This issue is addressed in Section D.4.3.3 (Biological Resources – Vegetation, Impacts and Mitigation Measures) by Mitigation Measure VEG-3a, requiring minimization of impacts and

no net loss for jurisdictional waters and wetlands. A textual clarification that compliance with 404 (b)(1) guidelines is required has been made in Section D.19.2.1 (Water Resources and Hydrology, Applicable Regulations, Plans, and Standards) under the discussion of Federal regulations.

- A2-4 The commenter again asks that a planning level assessment of the impacts to waters of the U.S. be performed prior to issuance of the Final EIS, including estimated impacts for each alternative.

Please see Responses to Comments A2-1 and A2-3, which identify information in the EIS addressing this request. All alternatives to the Proposed Project would result in a similar levels of impact to waters of the U.S. as the Proposed Project as incorporated in Section G (Comparison of Alternatives).

- A2-5 Comment recommends including additional measures to minimize impacts to aquatic resources, such as reduced access road width, bridges over jurisdictional waters, and buffers to minimize indirect effects to jurisdictional waters.

Mitigation Measure VEG-1c would require minimization of vegetation and habitat loss, and would apply throughout the project, including jurisdictional waters. Mitigation Measure VEG-1c is adequate to minimize impacts to aquatic habitat and jurisdictional waters; however, the text of the measure has been revised to more clearly state the requirement for the project to avoid and minimize impacts to jurisdictional waters. Mitigation Measure VEG-1c has also been revised to require the use of existing access routes or bridges over jurisdictional waters, as feasible. A requirement for construction or installation of new bridges over jurisdictional waters is not incorporated into the measure because the environmental effects of such construction or installation could be greater than the effects of access road crossings at grade. The noted revisions to Mitigation Measure VEG-1c clarify and strengthen the measure and do not introduce any additional environmental impact.

- A2-6 The commenter asks that the EIS quantify likely impacts to ephemeral waters and discuss potential mitigation. The commenter also asks for a commitment to avoiding or minimizing direct and indirect impacts to ephemeral streams.

See Responses to Comments A2-1 and A2-3. The drainage assessment referred to an evaluation of ephemeral washes. Mitigation Measure VEG-3a, which minimizes impacts and ensures no net loss for jurisdictional waters and wetlands, includes a discussion of ephemeral streams and the mitigation measures identified there avoid and/or reduce impacts to ephemeral waters. See Section D.4.3.3 (Biological Resources – Vegetation, Impacts and Mitigation Measures).

- A2-7 The comment notes that the portion of emissions caused by the federal actions must be considered in relation to the pollutant-specific applicability thresholds. The EIS show the direct and indirect emissions that could occur at the time of construction, after the federal actions of the tribal and BLM approvals. The majority of these construction emissions would occur outside of the Morongo reservation and outside of BLM lands. Therefore, these construction emissions are not counted as emissions that the agency can practically control or emissions for which the agency has continuing program responsibility. Since the emissions would be outside of the practical control of these federal agencies, these emissions were not included in the review of general conformity rule applicability presented in Table D.3-7 (Construction-Phase Emissions and General Conformity).

- A2-8 The comment requests a presentation of emissions estimates for each year of the project, rather than average calendar year emissions during construction. The detailed emission calculations for the entire Proposed Project are presented in EIS Appendix 6. The construction schedule and sequence is presented in Section B.3.10, and this preliminary information does not allow presentation of specific construction activities or emissions within any particular calendar year over the 36 to 48-month duration. The review of general conformity rule applicability presented in Table D.3-7 (Construction-Phase Emissions and General Conformity) shows that the average emission rates would be well below the thresholds for the life of the Project.
- A2-9 The commenter recommends deleting the discussion regarding regionally significant actions under the General Conformity Rule discussion in Section D.3.2.1 (Air Quality). As suggested, the EIS includes this revision, because this portion of the regulation was removed from the Rule in 2010.
- A2-10 The commenter recommends minimizing helicopter construction during the spring and summer months and, if feasible, scheduling heaviest helicopter use during fall and winter when ozone production is lowest. The commenter also requests quantification of potential benefits to air quality and a discussion of impacts to other resources from construction during cooler months.
- As stated in Response to Comment A2-2, the extent of helicopter use is not known. The construction of the Proposed Project over four years would be a complex undertaking, with towers and structures being erected and removed in various locations at various times, based on the final construction plan and the need to keep circuits energized while maintaining a safe working environment for crews. The number of hours of helicopter flight time, the locations of helicopter use, and when they would be used in the construction schedule are unknown. It is not feasible to quantify potential benefits except as generally presented within Mitigation Measure AQ-1c (Control helicopter emissions) in Section D.3.3.3 (Air Quality, Impacts and Mitigation). The mitigation measures pertaining to fugitive dust and helicopter flight will reduce the construction impacts to nonattainment ozone, PM10, and PM2.5 concentrations during all seasons of the year under any combination of helicopter activity with other construction activities.
- A2-11 The commenter recommends identifying and committing to using best available control technologies to reduce helicopter emissions.
- Mitigation Measure AQ-1c (Control helicopter emissions) addresses strategies for minimizing helicopter emissions. The measure requires minimizing helicopter idling and use of the smallest practical and available helicopter for the operation. This measure and Mitigation Measure T-7a (Prepare and implement a final helicopter use plan) ensure implementation of feasible controls and proper oversight of operating procedures for helicopters.
- A2-12 The commenter requests a qualitative description of climate change impacts and practicable mitigation measures to reduce project GHG emissions, and consideration of design modifications to improve resilience to climate change. The commenter recommends consulting the CEQ December 2014 revised draft guidance on consideration of GHG and climate change in NEPA.
- A qualitative and quantitative description of GHG emissions and impacts is provided in Section D.6.3.3 (Climate Change, Impacts and Mitigation Measures). No mitigation is iden-

tified. Transmission lines are designed to standards that take into account extremes in temperature and wind. These extremes include any likely effects of climate change during the life of the project. The CEQ 2014 guidance on GHG was considered and is discussed in Section D.6.2.1 (Climate Change, Applicable Regulations, Plans, and Standards, Federal).



Comment Set A3 – California Department of Transportation, District 8

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 8  
PLANNING (MS 725)  
464 WEST 4th STREET, 6th FLOOR  
SAN BERNARDINO, CA 92401-1400  
PHONE (909) 383-4557  
TTY 711  
www.dot.ca.gov/dist8



*Serious Drought.  
Help save water!*

September 14, 2015

Ms. Billie Blanchard  
CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

Southern California Edison West of Devers Upgrade Project  
08-SBd 215-PM 1.452; SBd-62 PM R1.374; RIV-10 PM 72.718-115.536

Dear Ms. Blanchard:

The California Department of Transportation (Caltrans) reviewed the Draft Environmental Impact Report/Environmental Impact Statement for Southern California Edison's Proposed West of Devers Upgrade Project. It will be located within the existing West of Devers transmission corridor in Riverside and San Bernardino counties, and traverses local and regional roadways including, Interstate 10 (I-10), Interstate 215 (I-215), and State Route (SR-62).

A3-1

The project proposes upgrades to existing 220 kV transmission lines between San Bernardino Vista and Devers Substations; equipment changes at seven substations; relocation of 66kV sub-transmission lines and 12 kV distribution lines; and installation of telecommunication lines and equipment. Temporary road or traffic lane closures and traffic controls would be required during stringing of overhead conductors and ground wire across roads, movement of large equipment, and trenching or boring in locations where lines would be placed underground. The project would require overhead conductors be strung across I-10, I-215, and SR-62 at various points.

Although portions of the proposed project are within Riverside, San Bernardino Cities, and County jurisdiction, policies and regulations that govern the State Highway System (SHS) take precedence and are applicable to all activities that impact the SHS. Public utility facilities will be granted permission to cross State highways; however the placement of longitudinal utilities within freeway and expressway right of way is prohibited under Caltrans policy.

**Permits**

This project as proposed will require a Caltrans Encroachment Permit; "Chapter Six-Utilities" of the Encroachment Permit Manual is most applicable to this project. The following noted sections of Chapter 6 are a few standards, which should be reviewed and incorporated into the project

"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"

Comment Set A3 – California Department of Transportation, District 8 (cont.)

Ms. Billie Blanchard  
September 14, 2015  
Page 2

process. However, these sections may not represent all of the applicable requirements for the proposed utility work.

- **606 ENCROACHMENTS ON FREEWAYS AND EXPRESSWAYS**

This section describes requirements for transverse and longitudinal utility encroachments on freeways and expressways.

- **606.3 Transverse Encroachments - Table 6.1**

Please refer to Caltrans Encroachment Permit Chapter 600-Utilities Permits website for further information:

[http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment\\_permits\\_manual/index.html](http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment_permits_manual/index.html)

Caltrans has the discretionary authority to issue special permits for the movement of vehicles/loads exceeding statutory limitations on the size, weight, and loading of vehicles contained in Division 15 of the California Vehicle Code. Requests for such special permits require the completion of, and application for a Transportation Permit. Information regarding Transportation Permit application can found on the website: <http://www.dot.ca.gov/hq/traffops/permits/>

**D.16.3.3 Impacts and Mitigation Measures**

- Preparation of a Construction Transportation Plan and Traffic Control Plan as noted in **Mitigation Measures for Impact T-1 (page D.16-14)** Correct the first sentence to read "...conductors be strung across regional routes I-10, I-215 and SR-62 (not SR-68).
- It is recommended that there be appropriate signage notifications of construction traffic throughout the construction period.

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact me at (909) 383-4557 or Rebecca Forbes at (909) 388-7139.

Sincerely,



MARK ROBERTS  
Office Chief  
Community and Regional Planning

A3-1  
cont.

A3-2

A3-3

*"Caltrans improves mobility across California"*

### Responses to Comment Set A3 – California Department of Transportation

- A3-1 Caltrans cites in its comment letter the requirements for encroachment permits and for special permits for movement of vehicles/loads exceeding statutory limitations. The comment is noted.
- A3-2 Caltrans notes that on roadway named in the EIS was numbered wrong. The correction has been made in Section D.16.3.3 of the EIS, under Impact T-1, changing SR-68 to SR-62.
- A3-3 Caltrans recommends “appropriate signage notifications for construction traffic throughout the construction period.”
- In Section D.16.3.3 (Impacts and Mitigation Measures), Mitigation Measure T-1b (Prepare Traffic Control Plans) requires that traffic control measures be consistent with the California Joint Utility Traffic Control Manual and other guidelines. This will ensure proper signage and controls where work is occurring in or adjacent to roadways. Each jurisdiction may have somewhat different requirements. For clarity, Caltrans has been named as one of the agencies to receive the Traffic Control Plans, in addition to local agencies who are to receive the plans.

**Comment Set A4 – City of Colton**



September 22, 2015

Billie C. Blanchard (CPUC)/Frank McMenimen (BLM)  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002

**Re: West of Devers Upgrade Project – Draft EIR/EIS  
(SCH #2014051041)**

Dear Ms. Blanchard and Mr. McMenimen:

The City of Colton is pleased to participate in the scoping process for the West of Devers Upgrade Project by providing comments on the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). As you are aware, Segment 2 of the project is located, in part, within the City of Colton. City of Colton staff has reviewed the Draft EIR/EIS in light of this, and in consideration of our previous comments on the Notice of Preparation (NOP). Our comments are as follows:

A4-1

**Visual Resources (D.18)**

The visual simulation depicted on Figures D.18-9A and 9B (vicinity of Canyon Vista Drive, just west of East Chase Canyon Lane) and the accompanying narrative finds that there will be "low to moderate change in visual character." The primary recommended mitigation is to "minimize visual contrast in project design." Visual impacts will likely increase with the addition of "FAA hazard marker balls." We request that the project proponent keep the City informed regarding FAA requirements regarding the marker balls as the project is designed in greater detail.

The accompanying narrative to the visual simulation (page D.18-39) also states that the taller structures will be placed lower on the slope, thereby minimizing the visual contrast. However, from the visual simulation it does not appear that the taller structures are being placed lower on the slope. Please provide more

A4-2

CIVIC CENTER  
650 N. La Cadena Drive  
Colton, CA 92324  
(909) 370-5099

## Comment Set A4 – City of Colton (cont.)

West of Devers Upgrade Project Draft EIR/EIS  
September 22, 2015  
Page 2

detailed information on the placement of towers, including the linear feet from existing pad(s) to proposed pad(s).

A4-2  
cont.

Although we welcome the visual simulation provided from the vicinity of Canyon Vista Drive, we request additional visual simulation of views of the towers from the following two neighborhoods (with and without the project): Mohave Drive east of Skyview Drive; vicinity of Prado Lane and East Ridge View Drive.

A4-3

We are disappointed to read that the “Segment 2 Underground Alternative: East of I-215” and the “Segment 2 Underground Alternative: East of Vista Substation” were eliminated from further analysis after preliminary screening. Due to the potentially significant impacts on views from residential areas, we again request further, detailed analysis of Segment 2 underground alternatives.

A4-4

### Land Use and BLM Realty (D.11)

Chapter D.11 references the Reche Canyon Specific Plan, and the proposed project’s impact on 71.3 acres. However, the accompanying exhibits do not depict the approved land uses within the Specific Plan (land uses are only identified as “Specific Plan”). We request that this chapter include an exhibit of the land uses permitted and planned by the Reche Canyon Specific Plan, including identification of any areas yet to be developed, and their proximity to the utility corridor.

A4-5

### Wildland Fire (D.20)

We note that Mitigation Measure WF1a requires preparation of a Fire Management Plan which will be reviewed by State and local fire prevention authorities. We would appreciate the opportunity to review the Fire Management Plan at least 30 days prior to adoption.

A4-6

### Transportation and Traffic (D.16)

Chapter D.16 references truck haul routes from the Material and Equipment Staging Area located at the northeast corner of Mt. Vernon Avenue and Canal Street in Grand Terrace: Barton Road – between Reche Canyon Dr. & Mt. Vernon Ave.; Mt. Vernon Ave. – between I-215 & Van Buren St.; and La Cadena Dr. – between I-215 & Agua Mansa Rd. Segments of each of these proposed truck routes are located within the City of Colton. The City of Colton is in the process of adopting new citywide truck routes. Please ensure that the Colton Public Works Department receives the Construction Transportation Plan and Traffic Control Plan for review and approval at least 30 days prior to commencing construction activities.

A4-7

### Recreation (D.15)

Table D.15-1 and the accompanying narrative identifies the common area of the Rancho Mediterranean Mobile Home Park as a “park.” Please add clarifying language that this area is a private common area, consisting of clubhouse, pool and tot lot for the mobile home park.

A4-8

**Comment Set A4 – City of Colton (cont.)**

West of Devers Upgrade Project Draft EIR/EIS  
September 22, 2015  
Page 3

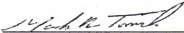
**Noise (D.13)**

Due to the potential noise and safety impacts of helicopter traffic on Reche Canyon area residents, please submit a copy of the Helicopter Land Use Plan to the City of Colton for review and comment at least 30 days prior to approval by the FAA. We note that “safety precautions may require homes near helicopter activity to be temporarily vacated” (page D.13-16). We request that the Helicopter Land Use Plan identify conditions that may require vacation of homes, and advanced notification requirements.

A4-9

Thank you for the opportunity to participate in the environmental review process for this project. We look forward to ongoing input and dialogue as final planning and design proceeds for the West of Devers Upgrade Project. Should you have follow-up questions or require clarification of our comments, please contact me at 909-370-5185.

Respectfully,



MARK R. TOMICH  
Development Services Director

- C: G. Harold Duffey, City of Grand Terrace City Manager  
T. Jarb Thaipejr, City of Loma Linda City Manager  
Bill Smith, City Manager, City of Colton  
David X. Kolk, Colton Electric Utility Director  
Amer Jakher, Colton Public Works Director

## Responses to Comment Set A4 – City of Colton

- A4-1 The commenter requests to be informed by SCE regarding FAA requirements for marker balls as the project is designed in greater detail. The comment is noted. SCE has also received a copy of this comment.
- A4-2 The commenter questions the accuracy of the structure location description in the discussion of KOP 2 and requests additional location information.
- The original project proposal along this portion of Segment 2 placed the new structures lower on the slope relative to the existing structures. However, a subsequent realignment of the Proposed Project moved the new structures upslope to elevations approximately 10 to 15 feet higher than the existing structures. The discussion of KOP 2 in Section D.18.3.3 (Visual Resources, Impacts and Mitigation Measures) did not reflect that change and has been corrected. However, the overall impact conclusions do not change because, even with the slight increase in structure elevations, in the structural context of the two remaining transmission lines, the proposed structures would remain co-dominant landscape features and the incremental increases in the associated visual contrast and view blockage would remain low. As a result, the overall visual change would also remain low. Lateral distances between the proposed new structure locations and the locations of the structures being replaced range from approximately 25 feet to approximately 260 feet along this portion of Segment 2.
- A4-3 The commenter requests visual simulations of two additional residential views along Segment 2. KOP 2 was selected to be representative of residential views along this portion of Segment 2.
- The viewpoint location was selected following a field review and a digital terrain analysis in order to acquire a viewing location that would be representative of the types of visual impacts that would be experienced along this portion of Segment 2. KOP captures a foreground view of multiple tower locations (both new and to be replaced).
- Although the additional viewpoints requested in the comment would provide different viewing perspectives of the Proposed Project, the viewing experiences would be very similar in that the views at both requested locations would encompass multiple existing structures to be replaced by new structures that would exhibit similar structural appearance, scale, skylining, and location relative to the existing structures to be replaced. The resulting visual impacts would be similar to those described for KOP 2 and, therefore, the simulation and analysis provided for KOP 2 adequately documents and characterizes the visual impacts that would typically be experienced at the two new requested locations.
- A4-4 The commenter requests that the Segment 2 underground alternatives that were eliminated during the alternatives screening stage be further evaluated in light of the potential for significant visual impacts on residential views.
- As documented in the KOP 2 analysis in Section D.18.3.3 (Impacts and Mitigation Measures), the typical visual impact on residential views along Segment 2 was evaluated and determined to be adverse, but the underground alternatives were not considered necessary to mitigate these visual impacts.



- A4-5 The commenter notes that in Section D.11 (Land Use and BLM Realty) the Draft EIR/EIS references the Reche Canyon Specific Plan but does not depict the approved land uses within the Specific Plan. The commenter requests an exhibit of permitted and planned land uses in the Specific Plan be added, including identification of areas yet to be developed and their proximity to the utility corridor.

The Specific Plan area is crossed by the existing SCE ROW in Segment 2 of the Proposed Project, as shown in Figure D.11-1b (General Plan Land Use, Segment 2) and Figure D.11-2b (Zoning, Segment 2) of the EIS. The project would entail upgrades within this existing corridor. See Figure B-3a (Proposed Transmission Line Route Segment 2) at the end of Chapter B (Description of the Proposed Project). In the EIS, Appendix 2 (Detailed Project Maps) shows details of the alignment and project area, including the Reche Canyon Specific Plan area. See Figures Ap.2-4 and Ap.2-5. Although specific uses within the Specific Plan area are not identified, the aerial photograph base for the maps (2013) shows developed and undeveloped areas, with the location of existing and proposed towers superimposed, so areas yet to be developed can be identified in proximity to the utility corridor.

- A4-6 The City of Colton requests the opportunity to review the project's Fire Management Plan at least 30 days prior to adoption.

In Section D.20.3.3 (Wildland Fire, Impacts and Mitigation Measures), Mitigation Measure WF-1a (Prepare and implement a Fire Management Plan) requires a draft plan be provided to each fire agency, including local municipal fire agencies, having jurisdiction over the areas through which the alignment passes. Resolution of comments on the Fire Management Plan is to occur at least 30 days prior to initiation of construction activities.

- A4-7 The commenter requests that the Colton Public Works Department receive the required Construction Transportation Plan and Traffic Control Plan at least 30 days prior to construction.

Mitigation Measures T-1a (Prepare Construction Transportation Plan) and T-1b (Prepare Traffic Control Plans) include the requirement for submission at least 30 days prior to construction.

- A4-8 The commenter requests additional language be included in the description of the Rancho Mediterranean Mobile Home Park recreation facilities.

In Section D.15 (Recreation), additional language was included in Table D.15-1 (Recreational Resources within the Project Study Area), and Section D.15.1.2.2, Segment 2: Colton and Loma Linda to clarify the amenities of this park.

- A4-9 The commenter requests a copy of the "Helicopter Land Use Plan" for review and comment 30 days prior to approval by the FAA. The commenter also requests the Plan identify conditions where homes may need to be temporarily vacated and include advanced notification requirements.

That some homes might need to be vacated for safety reasons during helicopter operations is in error and is omitted from Section D.13.3.3 (Impacts and Mitigation Measures) of the Final EIS.

The Helicopter Use Plan is described in Mitigation Measure T-7a (Prepare and implement a final helicopter use plan), in Section D.16.3.3 (Transportation and Traffic, Impacts and Mitigation Measures). As stated in the mitigation measure, the FAA has exclusive jurisdiction

over aircraft and aircraft operations. The Helicopter Use Plan is to impose requirements that aid CPUC and BLM in the monitoring of helicopter use, but that do not conflict with any FAA requirements. The Plan is not approved by FAA. Under FAA rules, helicopters are not permitted to carry external loads over structures, but may fly over structures if not carrying an external load. It has not been determined whether, where, and when helicopter use would occur. This would be determined on a case-by-case basis. In all cases, operations must comply with FAA requirements.

However, once the plan is made final, a copy will be provided as a courtesy to each affected jurisdiction through which the project passes. Mitigation Measure T-7a has been modified in Section D.16 (Transportation and Traffic) of the Final EIS to include this requirement. Review and approval of the plan and ensuring implementation through mitigation monitoring is the responsibility of CPUC and BLM.

Comment Set A5 – City of Redlands



City of  
**REDLANDS**

Incorporated 1888  
35 Cajon Street, Ste. 20/P.O. Box 3005, Redlands, CA 92373  
909-798-7555  
celliott@cityofredlands.org

OSCAR ORCI  
Development Services Director  
ROBERT D. DALQUEST, AICP  
Assistant Development Services Director

September 22, 2015

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

Regarding: Comments on Draft EIS/EIR for SCE West of Devers Upgrade Project

To Whom It Concerns:

This letter is in regards to the Notice of Availability of a Draft EIS/EIR (referred to as "EIS/EIR" for the SCE West of Devers Upgrade Project (Project) that was received by the City of Redlands. The City would like to thank you for the opportunity to comment on the EIS/EIR. The following provides the City of Redlands' comments and concerns on the portions of the Project that are proposed within its boundaries:

**I. Alternatives**

The City of Redlands supports the Phased Build Alternative as the environmentally superior alternative. The City supports this alternative as it would avoid significant permanent visual impacts, as well as severe short-term construction related impacts associated with the 66 kV subtransmission line relocation.

The City of Redlands would be supportive of the Iowa Street 66 kV Undergrounding alternative if the subtransmission line were to be undergrounded from Citrus Avenue to Barton Road along Iowa Street. The City does not support the Iowa Street 66 kV Undergrounding alternative as it is currently proposed and would represent a significant aesthetic impact within a residential and office environment.

**II. Project Description**

Table B-8. Typo correction. Redlands is within San Bernardino County, not Riverside County.

Page B-25. 2<sup>nd</sup> Paragraph states "A majority of materials associated with the construction efforts would be delivered by truck to designated staging yards..." What other modes of delivery would occur? Please account for how all materials would be delivered to the Lugonia Avenue staging yard.



Comment Set A5 – City of Redlands (cont.)

**III. Agricultural Resources**

Page D.2-4, Last paragraph. Correction. The City of Redlands has three agricultural zones (A-1, A-1-20, and A-2).

A5-3

**IV. Climate Change**

No mitigation is recommended. Though the EIS/EIR states no mitigation is required, should there be measures related to construction equipment operation in order to minimize GHG emissions, such as idling time?

A5-4

**V. Hazards and Hazardous Materials**

Mitigation measures are appropriate, however, should specific reference be made to a requirement for a SWPPP as there is in Section D.19? Will local agencies also review/approve the Soil Management Plan?

A5-5

**VI. Noise**

D.13-7. City of Redlands Municipal Code, 2nd Paragraph. The interpretation of the Redlands Noise Ordinance is incomplete. The proper reading of the ordinance is as follows "Construction And/Or Demolition: Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of six o'clock (6:00) P.M. and seven o'clock (7:00) A.M., including Saturdays, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work by public service utilities, the city or another governmental entity. All mobile or stationary internal combustion engine powered equipment or machinery shall be equipped with exhaust and air intake silencers in proper working order, or suitable to meet the standards set forth herein."

A5-6

D.13-7. Third Paragraph, last sentence. Operations at night or outside of work hours would be inconsistent with the City of Redlands' Noise Ordinance.

D. 13-7 Fourth Paragraph, first sentence. Define helicopter routes within the City of Redlands and provide the proximity of sensitive receptors. The City is concerned with the noise generated by helicopters when flying over residences and other sensitive receptors.

A5-7

**VII. Paleontological Resources**

Mitigation measures are appropriate, however, should paleontological work undertaken on lands not overseen by BLM still be completed by qualified paleontologists with appropriate permitting from the applicable local agency?

A5-8



**Comment Set A5 – City of Redlands (cont.)**

**VIII. Transportation and Traffic**

Impact T-4 will require an analysis of the quantity of large construction vehicles operating on local roads in order to allow appropriate mitigation analysis and estimation. How is deterioration to be evaluated? Mitigation measures presented only discusses surface damage. Surface damage can be agreed upon but deterioration of subgrade is based upon load of vehicles, quantity of vehicles, and design of structural section. The mitigation measure should specifically state Project should "make the local agency whole" in regards to accelerated deterioration of the road as a result of project construction traffic. Wording of T-4a could cause problems because roads cannot be repaired to pre-construction condition. i.e., if a section of road requires reconstruction, it cannot be reconstructed to be a 22 year old road. Reconstruction would put an onerous burden on the project. But only repairing surface damage excuses the project from deterioration. Would a specific charge of EAL/mile be appropriate mitigation, i.e., \$0.67/EAL/mile driven on a secondary truck route?

A5-9

**IX. Visual Resources**

Section 18.1.2.3. 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence. "For the most part, the Proposed Project would parallel existing transmission lines..." In what instances would the Proposed Project not parallel the existing line? Where would this occur?

A5-10

Section 18.3.2. Significance Criteria #1, second to last sentence. "...there are no officially designated or community recognized scenic vista view-points per se in the Proposed study area." Please explain the meaning of "per se" in this instance. Are there or are there not officially designated or community recognized scenic vista view-points in the proposed study area?

A5-11

VR-8a. Would local agencies have the opportunity to review the landscape mitigation plan prior to its approval and implementation?

A5-12

VR-9a. Define "excessive glare". The EIS/EIR states colors and finishes of structures are to be "consistent with local policies and ordinances". How would the applicant and/or the lead agency ensure compliance with local policies and ordinances?

A5-13

**X. Water Resources and Hydrology**

Mitigation measures are appropriate, however, will local agencies have oversight of the SWPPP for work done within their jurisdiction? i.e., working similar to D.20 – "Plan reviews shall include CPUC, BLM, CAL FIRE, San Bernardino and Riverside Counties, and local municipal fire agencies with jurisdiction over areas where the project is located."

A5-14

Comment Set A5 – City of Redlands (cont.)

**XI. Miscellaneous**

How shall the public within the Project study area be notified? The City of Redlands recommends incorporation of a mitigation measure requiring public information and notification prior to and during construction. Additionally, CEQA/NEPA and public hearing notices concerning the Project must be sent to City residents, not only those residences within 300 feet, but to all City residents impacted by the construction and operation of the Project

A5-15

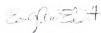
Appendix 9, Page 40. Typo in the determination paragraph of 7.41b.

In conclusion, it is the City of Redlands' opinion that Draft EIS/EIR requires clarification on the above mentioned items and supports the environmentally superior Phased Build Alternative. Further, the City of Redlands is requesting receipt of any and all CEQA/NEPA and public hearing notices regarding the Project.

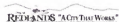
A5-16

If you have any questions concerning the above comments, please contact me at (909) 798-7555 ext. 1797 or by email at: [emilyelliott@cityofredlands.org](mailto:emilyelliott@cityofredlands.org).

Sincerely,



Emily Elliott  
Associate Planner



## Responses to Comment Set A5 – City of Redlands

A5-1 The commenter expresses support for the Phased Build Alternative and states that it would be supportive of the Iowa Street 66 kV Underground Alternative if the 66 kV subtransmission line is undergrounded from Citrus Avenue to Barton Road along Iowa Street. See Response to Comment F3-441 and F3-559 regarding a revised simulation of the proposed new Iowa Street 66 kV line.

The commenter's support for the Phased Build Alternative is noted.

The Iowa Street 66 kV Underground Alternative focuses on the segment of the proposed overhead route where significant visual impacts have been identified, which is by the existing residential subdivision, as explained in EIS Section D.18 (Visual Resources). The commenter is suggesting extending the undergrounding north of where it is proposed to start near Orange Avenue.

SCE noted in its Response to CPUC Data Request #15 (ALT-28, dated March 30, 2015) that extending the alternative to the north of its current overhead-to-underground transition location would require installation of an underground conduit system through a single-lane bridge that crosses a historic drainage feature located approximately 325 feet north of the centerline intersection of Orange Avenue and Iowa Street. Although technically feasible, the engineering and construction requirements would be more involved depending on how the underground conduit would be installed or attached to the bridge.. The additional costs of underground construction, as well as the additional construction impacts from extended lane and/or road closures during the conduit and vault installation process, are not justified where impacts based on existing visual conditions.

A5-2 The commenter notes a typographical error and to request information on materials that would be delivered to the Lugonia Avenue staging yard and what methods of delivery would be used.

As requested, Table B-8 (Potential Water Providers to WOD Upgrade Project) in Section B (Description of the Proposed Project) has been corrected to show the City of Redlands in San Bernardino County.

Section B.3.1.1 (Project Description, Staging Areas and other Work Areas) states that “[a] majority of materials associated with the construction efforts would be delivered by truck to designated staging yards, while some materials may be delivered directly to the temporary transmission and subtransmission construction areas.” To clarify, all materials delivered to Lugonia Yard would be by truck or van.

A5-3 The City of Redlands notes that they have three agricultural zones. Agricultural District A-2 has been added in Section D.2.1.2 under zoning Designations for the City of Redlands.

A5-4 The commenter suggests minimizing GHG emissions by such measures as reducing equipment idling. Idling and emission reduction are addressed in Section D.3 (Air Quality). Presently, all equipment owners are subject to a five-minute idling restriction under CARB rules (13 California Code of Regulations, Chapter 10, Section 2449). See also Mitigation Measure AQ-1b (Control off-road equipment emissions) and AQ-1c (Control helicopter emissions) in Section D.3.3.3 (Air Quality, Impacts and Mitigation).



- A5-5 The commenter believes that the Hazards and Hazardous Materials mitigation measures are appropriate, but asks if specific reference should be made to a SWPPP. The commenter also asks if local agencies will review/approve the Soil Management Plan.
- A Stormwater Pollution Prevention Plan (SWPPP) is required under the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) permit and the General Construction Permit. Section D.19 (Water Resources and Hydrology), Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) addresses this issue. The SWPPP discussion in Section D.19 is now cross-referenced in Section D.10.3.3 (Hazards and Hazardous Materials, Impacts and Mitigation Measures).
- Section D.10.3.3 (Hazards and Hazardous Materials, Impacts and Mitigation Measures), under Mitigation Measure HH-2a (Prepare a Soil Management Plan) states that the Plan shall be submitted to the lead agencies (CPUC and BLM) for review and approval prior to the start of construction. However, any contaminants discovered during construction will be reported to local CUPA agencies and/or RWQCB. Once the plan is made final, a copy will be provided as a courtesy to each jurisdiction through which the project passes. Mitigation Measure HH-2a has been modified in Section D.10 (Hazards and Hazardous Materials) of the Final EIS to include this requirement. Review and approval of the plan and ensuring implementation through mitigation monitoring is the responsibility of CPUC and BLM.
- A5-6 The commenter notes that the presentation of the Redlands Noise Ordinance is incomplete and that operations at night or outside of work hours would be inconsistent with the City of Redlands' Noise Ordinance. The discussion of the Noise Ordinance in Section D.13.2.2 (Noise) has been edited to be consistent with the comment. The comment on night noise is noted. No change in the text is required.
- A5-7 The commenter requests a definition of helicopter routes within Redlands and the proximity of sensitive receptors. The City of Redlands is concerned with noise generated by helicopters over residences and sensitive receptors. Please see Response to Comment A4-9, which notes that FAA has complete jurisdiction over helicopters and pilots. The Helicopter Use Plan would specify transit routes for helicopters.
- A5-8 The commenter asks whether qualified paleontologists will be used on Proposed Project lands that are not administered by the BLM. Mitigation Measure V-1a (Develop Paleontological Resource Mitigation and Monitoring Plan) explains that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be conducted by qualified paleontologists with a current Paleontological Resources Use Permit for BLM lands in California. To clarify, there are no permitting requirements for non-BLM-administered lands.
- A5-9 The city questions how road deterioration is to be evaluated and requests that the mitigation measures specify that the project should "make the local agency whole" in regards to accelerated deterioration of the road as a result of project construction traffic. The comment goes on to state that while surface damage can be agreed upon, deterioration of subgrade is based on vehicle load, quantity of vehicles, and design of the road section. Requiring repair to pre-construction conditions is problematic if a section requires reconstruction, it cannot be reconstructed to an old status or standard. Repairing surface damage does not address subgrade deterioration. The city suggests a specific charge, such as \$0.67/Equivalent Axle Load (EAL)/mile driven on a secondary truck route.

The project would be located in two counties and multiple cities, and would require use of roads under these jurisdictions as well as roads under Caltrans jurisdiction. Accounting for which vehicles were on which roads in which jurisdictions and for how many miles would be impossible to administer. Mitigation Measure T-4a (Repair roadways damaged by construction activities) has been amended to clarify that unless an alternative method for determining roadway condition is required by a given jurisdiction, the approach would be as specified in the mitigation measure.

- A5-10 The commenter requests clarification of the language used in Section D.18.1.2.3 (Segment 3: San Timoteo Canyon) that suggests not all of the proposed Project parallels existing transmission lines in San Timoteo Canyon.

The language in Section D.18.1.2.3 has been changed to more clearly communicate that the entire proposed Project does, in fact, parallel existing transmission lines in San Timoteo Canyon.

- A5-11 The commenter requests clarification in the first impact significance criterion discussion presented in Section D.18.3.2 (CEQA Significance Criteria) as to whether there are officially designated or community recognized scenic vista viewpoints in the proposed study area.

Significance criteria apply analysis under to CEQA, but not NEPA. The discussion of impact significance criterion one has been modified to clarify that there are no officially designated or community recognized scenic vista viewpoints in the proposed study area.

- A5-12 The commenter asks whether local agencies would have the opportunity to review the landscape mitigation plan prior to approval and implementation.

A Project Design Plan, which addresses earthwork, vegetation, and reclamation and restoration, is described in Mitigation Measure VR-8a (Minimize visual contrast in project design). Once the plan is made final, a copy will be provided as a courtesy to each jurisdiction through which the project passes. Mitigation Measure VR-8a has been modified in Section D.18 (Visual Resources) of the Final EIS to include this requirement. Review and approval of the plan and ensuring implementation through mitigation monitoring is the responsibility of CPUC and BLM.

- A5-13 The commenter requests clarification of what is meant by excessive glare and the mechanism by which compliance with local policies and ordinances will be achieved.

Excessive glare, in this case, refers to the visibility of reflected sunlight off of structural surfaces that is either visually distracting to a viewer or causes noticeable eye stress (discomfort glare). Local policies and ordinances are considered (See for example Appendix 9 [Policy Screening Report]); however, the CPUC has State jurisdiction over the siting and design of the construction of investor-owned public utility facilities. Such projects are exempt from local land use and zoning regulations and permitting in accordance with General Order No. 131-D, which is applicable to all components of a project. However, Section XIV.B requires "the utility to communicate with, and obtain the input of, local authorities regarding land-use matters and obtain any non-discretionary local permits." The City of Redlands General Plan's Guiding Policies and Implementing Policies were considered with regard to Visual Resources and it was determined that the project was consistent with these. Please see Appendix 9, Section 4.3 (City of Redlands).

- A5-14 The commenter asks if local agencies will have oversight of the SWPPP for work done within their jurisdiction.

See the response to Comment A1-1. Local agency oversight is now included in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation) under Mitigation Measure WR-3a, requiring implementation of flood, erosion, and scour protection for aboveground and belowground improvements. The California Construction General Permit requires the discharger to certify that all State and local requirements have been met in accordance with the General Permit.

- A5-15 The commenter asks about public notification and requests a mitigation measure requiring public information and notification prior to and during construction and that all City residents affected by the project be notified of CEQA/NEPA and public hearings.

CPUC General Order 131-D requires public notification within 300 feet of the right-of-way; however, the CPUC and BLM notified property owners within 600 feet of the project route alignment. Prior to the CEQA/NEPA public informational meetings on the Draft EIR/EIS, notice of the meetings was published in four newspapers, including Redlands Daily Facts on Tuesday August 11, 2015, which serves the area of the City of Redlands.

EIS Section I (Public Participation and Consultation) describes the public involvement process. Announcements of public meetings and other information on the environmental review process are available on the BLM and CPUC project websites. During project construction, weekly reports and all project variances and Notices to Proceed will be posted on the CPUC website.

The BLM hosts a project website that contains project-related documents and announcements. The BLM project website is located here:

<http://www.blm.gov/ca/st/en/fo/palmsprings/transmission/WestOfDeversProject.html>

On the CPUC project website, there is also a link to the project's General Proceeding (A.13-10-020) webpage where the public is able to subscribe to receive announcements when documents are docketed and meetings are scheduled outside of the CEQA process.

<http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm>

In the EIS, APM REC-2 requires SCE to prepare a construction notification plan identifying procedures for notifying the public of the location and duration of construction. The specific requirements of the construction notification plan are detailed in Section D.11 (Land Use and BLM Realty) under Mitigation Measure LU-1a (Prepare construction notification plan), including public notice mailers, newspaper advertisements, public venue notices, and a toll-free information hotline. The construction notification plan will detail a complete notification and public inquiry process and ensure that residents, landowners and others potentially impacted are informed of construction activities, and procedures are established and documented for taking and responding to construction comments and concerns.

- A5-16 A typographical error was noted by the commenter in Appendix 9 (Policy Screening Report) under Policy 7.41b in Section 4.3 (City of Redlands, California). The commenter reiterates support for the Phased Build Alternative and requests receipt of all CEQA/NEPA and public meeting notices.

The topographical error has been deleted and the policy determination column now states "The Proposed Project and alternatives would not preclude the continued operation of existing livestock/dairy farms."

The commenter's support for the Phased Build Alternative is noted. The City of Redlands is on the EIR/EIS mailing list, and thus will receive any future notices and will be notified in the event any future CEQA/NEPA public meetings are held. See Response to Comment A5-15 for information on how to subscribe to receive notification for public hearings related to the CPUC's General Proceeding.

Comment Set A6 – CPUC Office of Ratepayer Advocates

ORA Comments on the  
Draft Environment Impact Report/Environmental Impact Statement Issued in  
Southern California Edison's  
Application 13-10-020, West of Devers Upgrade Project

**1. PROPOSED PROJECT**

A6-1

On October 25, 2013, Southern California Edison Company (SCE) filed Application (A.)13-10-020 seeking California Public Utilities Commission (Commission) approval for a Certificate of Public Convenience and Necessity (CPCN) to construct the West of Devers Upgrade Project (WODUP or Proposed Project). SCE proposes to replace or upgrade four 220 kilovolts (kV) circuits along approximately forty-five corridor-miles, approximately eight of which are across the Trust Lands of the Morongo. Such upgrades would increase the system transfer capacity from 1,600 MW to 4,800 MW.<sup>1</sup> SCE claims the proposed increase is needed to provide Full Capacity Delivery Service (FCDS) for renewable power projects that are new and proposed or planned to be located in the Blythe and Desert Center areas east of the Devers Substation.<sup>2</sup> SCE's estimates the Proposed Project would cost approximately \$955 million in 2013 constant dollars, including 35% contingency.<sup>3</sup>

The Draft Environmental Impact Report (DEIR), dated August 7, 2015, identifies three CPUC and Bureau of Land Management (BLM) basic project objectives under California Environmental Quality Act (CEQA)<sup>4</sup> as follows:

- To upgrade the West of Devers (WOD) 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW;
- To support achievement of State and Federal renewable energy goals; and
- To maximize the availability of remaining space in the corridor to the extent practicable, so future use of the corridor for additional transmission line upgrades is not precluded.

<sup>1</sup> DEIR at pp. A-2 to A-5.

<sup>2</sup> *Id.* at p. A-5.

<sup>3</sup> SCE's Appl. at 14.

<sup>4</sup> DEIR at pp. A-11 to A-12.

**Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)**

A6-1  
cont.

The DEIR evaluated fourteen alternatives<sup>5</sup> to the Proposed Project and selected three for further consideration. In addition, the DEIR identified three (3) No-Project alternatives (Options 1, 1B, and 2), each of which includes substantial new 500 kV and/or 220 kV facilities and rights-of-way.<sup>6</sup> Of these fourteen alternatives, the DEIR identified the Phased Build Alternative (PBA) as the environmentally superior overall.<sup>7</sup>

The PBA would install “795 Drake” Aluminum Conductor Composite Reinforced (ACCR) conductor on the identified circuits instead of the 2B-1590 Aluminum Conductor Steel Reinforced (ACSR) conductor identified in the Proposed Project, while maintaining the design across the Morongo land that would be similar to the Proposed Project.

ORA supports several aspects of the DEIR, as follows:

- Recognition that simply because generation projects are in the interconnection queue does not indicate that they will come to fruition.<sup>8</sup>
- Of the 1,179 interconnection requests submitted to the CAISO for study, only 8% have gone commercial.<sup>9</sup>
- The Proposed Project results in transmission capacity that exceeds the identified need by a wide margin.<sup>10</sup>
- The efforts of the DEIR to redefine the need for transmission to a lesser capacity.

On the other hand, ORA disagrees with the following aspects of the DEIR:

- Forecasted congestion on this portion of the transmission system is a more reasonable metric of project need than generator requests for deliverability.
- A security-constrained production cost simulation is a more reasonable tool for assessing potential congestion than a power flow model.
- The power flow study presented in the DEIR<sup>11</sup> overestimates the transmission capacity needed for renewable generation.

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<sup>5</sup> Eleven (11) of the fourteen (14) alternatives were eliminated after a detailed evaluation process while three alternatives were fully analyzed in the EIR/EIS (DEIR at secs. C.3.1 and C.3.2).

<sup>6</sup> DEIR at sec. C.6.3.

<sup>7</sup> *Id.* at sec. G.5.

<sup>8</sup> *Id.* at p. A-6.

<sup>9</sup> *Id.* at append. 5, “Project Alternatives Assessment – A Power Flow Analysis (ZGlobal Study),” at 6.

<sup>10</sup> *Id.* at p. A-6.

Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)

- A Project alternative with a more reduced scope than the DEIR's alternatives should be considered.

A6-1  
cont.

## 2. DISCUSSION

A6-2

### 2.1 Congestion is a more reasonable metric for transmission need than deliverability.

The focus on deliverability in both the SCE application and the DEIR is misplaced. Full Capacity Deliverability Service (FCDS) is a value added element for generators so that their capacity may potentially count towards the Load Serving Entities (LSE's) Resource Adequacy (RA) requirements. Though most of the renewable power projects that are new and proposed or planned to be located in the Blythe and Desert Center areas east of the Devers Substation request FCDS transmission service,<sup>12</sup> this does not justify WODUP as needed and reasonable or in California and the ratepayers' interest.

For the WODUP, SCE has chosen to fund the upgrades, instead of collecting initial funding from generators located in the Blythe and Desert Center areas east of the Devers Substation that are requesting FCDS.<sup>13</sup> Consequently, the generators receive no economic signal as to the cost of the WODUP upgrades and would likely request such services. Therefore, the generators' request for FCDS at no cost to them does not support the need for WODUP.

### 2.2 California is not in need of additional system resource capacity.

A6-3

The Commission's 2014 LTPP does not have an identified need for system capacity before 2033.<sup>14</sup> Notwithstanding this projected surplus of capacity, the ability of solar generation to contribute capacity is expected to significantly diminish as California transitions to Effective Load Carrying Capability (ELCC) methodology of resource counting.<sup>15</sup> The Commission's RPS Calculator indicates

<sup>11</sup> *Id.* at append. 5.

<sup>12</sup> *Id.* at p. A-5.

<sup>13</sup> FERC EL11-10. Even if SCE had not decided to release the generators from this funding requirement for these Transition Cluster generators, under the CAISO Generation Interconnection and Deliverability Allocation Procedures (GIDAP) beginning with Cluster 5, the cost of Area Deliverability Network Upgrades (ADNUs) such as the WODUP are not allocated to the individual generators.

<sup>14</sup> CPUC Energy Division 2014 LTPP Scenario Tool for R.13-12-010 (Scenario tab row# 51), March 2015.

<sup>15</sup> The implementation of the ELCC methodology, as compared with the current exceedance-based methodology, would result in different dependable capacity (NQC) values for wind and



**Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)**

that based on the ELCC metric, a solar PV resource would have its NQC value reduced from 85%-90% to about 15%-30% of its nameplate capacity as solar penetration increases.<sup>16</sup>

A6-3  
cont.

If deliverability were considered at all, the focus should be narrowed to existing Power Purchase Agreements (PPAs). Because the Commission has reviewed and approved PPAs that have generators located in the Blythe and Desert Center areas east of the Devers Substation and has assumed the availability of FCDS on that basis, the need for deliverability in the Project area of the electric system should be restricted to those projects with approved PPAs.

The California mandate that retail sellers to procure 33% of their electric supply from eligible renewable resources by 2020 is an energy-based requirement.<sup>17</sup> As such, whether the energy from a specific renewable generator has received FCDS does not impact how such received energy counts toward the retail sellers' procurement goals. Also, whether a generator has received FCDS does not impact whether a generator is allowed to connect to the electric system in a safe and reliable manner. Generators located in the Blythe and Desert Center areas east of the Devers Substation can continue to connect to the grid irrespective of whether the WODUP is constructed.<sup>18</sup> Such generators have the option to connect as Energy-Only projects and still count toward State and Federal renewable energy goals without depending upon the WODUP.<sup>19</sup>

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solar resources. In particular, the ELCC studies have shown significant decrease in the solar resources' NQC in the areas with higher solar penetration. This would lower the RA value associated with such resources.

<sup>16</sup> See CPUC RPS Calculator v6.1, *available at* <http://www.cpuc.ca.gov/PUC/energy/Procurement/LTPP/2012+LTPP+Tools+and+Spreadsheets.htm>.

<sup>17</sup> Senate Bill 2 (1X) (Simitian, Energy: renewable energy resources. Stats. 2011, ch.1), *available at* [http://www.leginfo.ca.gov/pub/11-12/bill/sen/sb\\_0001-0050/sbx1\\_2\\_bill\\_20110412\\_chaptered.pdf](http://www.leginfo.ca.gov/pub/11-12/bill/sen/sb_0001-0050/sbx1_2_bill_20110412_chaptered.pdf).

<sup>18</sup> SCE Data Response PD-25.

<sup>19</sup> The WODUP may even be detrimental to such projects as the proposed construction work would necessitate transmission circuits being taken out of service and reducing the transmission capacity serving this area.

**Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)**

**2.2 A better metric to assess whether renewable energy can reach the system load and therefore count towards the State and Federal renewable energy goals is congestion.**

A6-3  
cont.

Congestion on a path indicates that generation had to be reduced and therefore not delivered.<sup>20</sup> An economically and environmentally sensitively designed electric system will experience some level of congestion. It would be unreasonable and not in ratepayers' interests to build an electric system that includes excess capacity to accommodate all potential generation pattern options.

In the California Independent System Operator (CAISO) markets, congestion is managed through pricing signals, where generation on the congested side of a path is given a price signal to reduce its output. The response of each generator will depend on its sensitivity to the market prices. More price-sensitive generation – such as the conventional gas fired generation in this area as well as imports from Arizona that pass through this area – will be curtailed first to clear any congestion. Price insensitive generation, such as the renewable generation, would be the last to curtail production.

Therefore, congestion metric to determine whether the existing transmission capacity should be increased would look at both the amount of energy curtailed and generators that would experience the curtailment.

**2.4 A security-constrained production cost simulation tool is a power-flow model for assessing potential congestion.**

One of the Proposed Project's objectives listed in the DEIR is to increase the system deliverability and then assesses the alternative's ability to meet this objective by using a power-flow model.<sup>21</sup> Such a model is widely used in transmission system reliability assessments and used to determine a maximum transfer capability of a portion of the electric system. However, such a model only provides a snapshot of how the system would perform under an assumed single system condition. The system condition modeled is commonly selected so as to result in a high stress on the portion of the system under study. Therefore, it provides little insight into how frequently, if ever, such conditions might exist or the amount of energy that may be impacted by a transmission constraint.

<sup>20</sup> In this particular circumstance, the energy could be scheduled east towards Arizona rather than curtailed. However, such rescheduling would not support California's renewable energy goals.

<sup>21</sup> WODUP DEIR, append. 5, ZGlobal Study at 7.

**Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)**

A6-3  
cont.

A more effective industry tool for investigating congestion is a security-constrained production cost simulation model. Such a model looks at multiple hours in a time period (frequently one year), the spatial system loads, the capacity of the transmission system, and the production cost curve of each generator to simulate how the system would operate over the course of a year. Levels of congestion and changes in congestion associated with system improvements can then be assessed. Furthermore, it can be determined whether and to what extent renewable generators in an area may be curtailed

Therefore, ORA recommends a security-constrained production cost simulation model should be utilized, since it is a better tool to assess whether increases in transmission capacity are needed to support achievement of the State and Federal renewable energy goals.<sup>22</sup>

**2.5 The power-flow study presented in the DEIR overestimates the transmission capacity needed for renewable generation.**

In order to access the performance of alternatives to the WODUP, the DEIR includes a power system analysis using a power flow model.<sup>23</sup> This power system study investigates how the Proposed Project, the Phased Build alternative, and the No Project alternatives perform under two alternate renewable generation development portfolios: (i) the Cluster 7 Phase I resource portfolio; and (ii) the CAISO 2024 Summer Peak Reliability base case portfolio. The study also includes sensitivity studies within these portfolios of the impact of increased imports from the Imperial Irrigation District (IID).

The DEIR notes that the Cluster 7 Phase I base case was created by the CAISO which focused on the reliability and deliverability of *all* generation projects that had applied under Cluster 7, as well as higher-queued generation still active in the CAISO's interconnection queue, irrespective of whether it is a reasonable assumption that all of these generators would will be built.<sup>24</sup> As the DEIR notes, historically only 8% of the generation projects that have requested studies in the CAISO interconnection process have gone into commercial operation.<sup>25</sup> Therefore this case includes a highly speculative amount of generation which should be excluded from consideration. Even the CAISO does not consider such levels of

<sup>22</sup> In the event of congestion that could impact renewable generation, CPUC RPS Calculator is also a useful tool to understand whether there are locational alternatives for renewable generation so that the goals could be met without additional transmission capacity.

<sup>23</sup> WODUP DEIR, append. 5, ZGlobal Study at 7.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.* at 6

**Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)**

generation as reasonable and does not use it in their interconnection process to determine whether there is a need for Area Delivery Network Upgrades, such as the WODUP.

A6-3  
cont.

The CAISO 2024 Summer Peak Reliability base case portfolio also includes speculative generation. The generation model shown in Table A4 of the DEIR Power System Study includes unspecified generation at both Colorado River (Pgen<sup>26</sup> = 329.4 MW) and Red Bluff (Pgen = 274.6 MW), as well as specific generators without PPAs. Consequently, this pattern is speculative and overstates the need for deliverability.

The California Energy Commission (CEC) and the Commission use the RPS Calculator<sup>27</sup> to develop renewable resource portfolios that are studied in the CAISO's annual Transmission Planning Process (TPP). The RPS Calculator (version 5) was used to develop the resource portfolios. The RPS calculator makes assessment of overall cost, including the cost of transmission upgrades triggered by the resources while selecting the lowest cost resources based on certain criteria.<sup>28</sup>

The renewable resource portfolio of 3,800 MW of renewable development in Riverside East used in the reference base case in the 2014-2015 TPP<sup>29</sup> is based on the assumption that the WODUP had been built to the full scale of the Proposed Project.<sup>30</sup> Because the RPS Calculator would have assumed the WODUP as a foregone conclusion and not subject to an economic test, it would tend to assume higher resource development in the Riverside East area.

In the prior planning cycle (2013-14), only 964MW were modeled in the Riverside East area, because the RPS calculator used at that time assumed 964 MW could be accommodated on the existing system without WODUP.<sup>31</sup> The latest version of

<sup>26</sup> The term "Pgen" means the dispatched individual generation level in a power flow case.

<sup>27</sup> See RPS Calculator, available at <http://www.cpuc.ca.gov/PUC/energy/Procurement/LTPP/2012+LTPP+Tools+and+Spreadsheets.htm>.

<sup>28</sup> The tool ranks and sorts individual resources within 48 resource zones to meet local requirements and to fill existing transmission capacity. It develops bundles to be delivered over minor upgrades and new backbone transmission. It then selects resources and transmission bundles until the specified RPS standard is met.

<sup>29</sup> See 2014-2015 TPP, available at <http://www.caiso.com/Documents/2014-2015RenewablePortfoliosTransmittalLetter.pdf>.

<sup>30</sup> *Id.*

<sup>31</sup> See RPS Calculator, available at <http://www.caiso.com/Documents/2013-2014RenewablePortfoliosTransmittalLetter.pdf>.

**Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)**

the RPS Calculator (v6.1)<sup>32</sup> selects only 1,200 MW of resources in the Riverside East area, including only 124MW of new generic resource, all of which can be accommodated on the existing transmission. In other words, the RPS Calculator (v6.1) does not identify any need for WODUP. Moreover, under this RPS portfolio, there would be no additional transmission capacity needed elsewhere in the State to make up for a smaller amount of generation selected in the Riverside East area relative to the CAISO 2024 Summer Peak Reliability base case portfolio.

A6-3  
cont.

As noted previously, if the need for deliverability is to be considered in this assessment despite the current state surplus in generation capacity, the amount of generation modeled as needing deliverability should be restricted to those generation projects with PPAs. This would be substantially fewer generators than shown in Table A4 of the DEIR Power System Study.

Table 1 below shows an estimate of the existing deliverability available through the West of Devers corridor, as well as the PPA-contract capacity relying on this deliverability. The existing deliverability is estimated by summing the entire serial-group generator queue capacities that have received FCDS plus the Path 42 Maximum Import Capability (MIC) and the capacity added by the Interim Upgrades. Table 1 shows that there is approximately, 1,112MW of FCDS capacity currently available the WOD corridor in excess of the existing and PPA-projects seeking FCDS.

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<sup>32</sup>See RPS Calculator (v6.1), *available at*  
<http://www.cpuc.ca.gov/PUC/energy/Renewables/hot/RPS+Calculator+Home.htm>.

Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)

**Table 1. Calculation of Existing System FCDS Capacity Not Utilized By Generation Projects PPAs**

Queue Position	Technology	Cluster	POI	Capacity (MW)
1	W	Serial	Devers-Garnet 115 kV line (Tap)	*
3	NG	Serial	Devers Substation 230 kV Bus	850
11A	NG	Serial	Julian Hinds Substation 230kV	520
17	NG	Serial	Colorado River Substation 500kV bus	520
49	W	Serial	Devers Substation	*
138	W	Serial	Devers-Vista 230kV #1	150
146	PV	Serial	Red Bluff Substation 230kV	150
147	PV	Serial	Red Bluff Substation 230kV	400
219	NG	Serial	Colorado River Substation 500kV bus	50
WDT263	PV	Serial	Chanslor 33 kV (Blythe 161 kV)	21
Subtotal of Serial Gen. Allocated FCDS				2661
Path 42 MIC**				462
WOD Interim Upgrades				1050
<b>Existing FCDS Capacity</b>				<b>4173</b>
Technology - W=Wind, NG=Natural Gas, PV=Solar Photovoltaic, ST=Solar Thermal				
* No longer in CAISO Queue, but not shown as being either completed nor withdrawn - total = 117 MW				
Power Purchase Agreements				
Queue Position	Technology	Cluster	POI	PPA Capacity (MW)
3	NG	Serial	Devers Substation 230 kV Bus	728
11A	NG	Serial	Julian Hinds Substation 230kV	490
146	PV	Serial	Red Bluff Substation 230kV	150
147	PV	Serial	Red Bluff Substation 230kV	400
193	ST	Transition	Colorado River Substation 500kV	500
294	ST	Transition	Colorado River Substation 500kV	110
365	ST	Transition	Red Bluff Substation 230kV	**
WDT263	PV	Serial	Chanslor 33 kv (Blythe 161 kV)	21
Subtotal of PPAs in CAISO Area				2399
Target 2020 Path 42 MIC***				662
<b>PPA Contracted Capacity</b>				<b>3061</b>
<b>FCDS Capacity in excess of PPAs</b>				<b>1112</b>

Technology - W=Wind, NG=Natural Gas, PV=Solar Photovoltaic, ST=Solar Thermal

\*\*PPA Terminated

\*\*\*462 MW is the current MIC from the Blythe Path 42 into Devers and 3

1112 MW reflects the target MIC in 2020 as per the CAISO 2014-15 Transmission Plan

The contingencies selected for consideration in the power system study were excessive, thereby understating the capacity of the system and overstating the need for additional capacity. The ZGlobal Study states that the assessment of the transmission system performance included about 70 single contingencies and

A6-3  
cont.

**Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)**

2,300 double contingencies.<sup>33</sup> From the information presented in power-flow analysis contingency tables located in the DEIR, these 2,300 double contingencies included overlapping outages (commonly referred to as *N-1-1* contingencies). When planning for *N-1-1* contingencies, the normal practice is to assume that there is an opportunity to redispatch the system following the initial contingency to avoid system performance violation following the second contingency. This is the approach used in the CAISO's Generator Interconnection and Deliverability Study Methodology Technical Paper which states that the CAISO deliverability methodology only considers multiple contingencies associated with a single initiating event (common mode and bus outages).<sup>34</sup>

A6-3  
cont.

Therefore, many of the double contingencies studied in the DEIR should be excluded from the power system study since the system can be redispatched between events for overlapping outages. Excluding such contingencies is expected to show greater transmission transfer capability and less need for new transmission capacity.

**2.6 ORA recommends that the Commission adopt and approve a project alternative that is more limited in scope than any of DEIR's stated alternatives.**

A6-4

Based on the foregoing, ORA disagrees with the DEIR's Basic Objective 1 to upgrade the transmission lines to increase system deliverability by at least 2,200 MW. There has been no forecast of congestion presented that would support a need to the Project to facilitate access to renewable energy in the Riverside East area. Furthermore, there is no need for system capacity in California to justify a major transmission expansion to increase the pool of capacity resources. Even if there were such a need, transition to an ELCC method of capacity counting would diminish the value of solar resources in fulfilling such a need.

If despite this lack of need for capacity, the need for transmission capacity to support the existing PPAs were considered, the existing system capacity with the interim WOD upgrades is sufficient. SCE's Proponent's Environmental Assessment (PEA) lists in Table I-1 the interconnection requests in the CAISO queue that may benefit from the Project, including the PPA status of each. Since

<sup>33</sup> WODUP DEIR, append. 5, ZGlobal Study at 9.

<sup>34</sup> See CAISO's Generator Interconnection and Deliverability Study Methodology Technical Paper at 6, available at <http://www.caiso.com/Documents/TechnicalPaper-GeneratorInterconnection-DeliverabilityStudyMethodology.pdf>.



Comment Set A6 – CPUC Office of Ratepayer Advocates (cont.)

the SCE application, Q365 has lost its PPA.<sup>35</sup> Therefore only 500 MW of interconnection requests remain, which is well within the capacity of the interim upgrades.<sup>36</sup> Furthermore, when considering pre-Transition Cluster projects that have been allocated deliverability but do not have a PPA, even more system margin becomes apparent.

A6-4  
cont.

3. CONCLUSION

A6-5

A Project Alternative that maintains the existing transmission capacity, including the interim upgrades, should be considered the initial phase in a Phased Build approach. This would likely include only the upgrades through the Morongo lands as described in the Proposed Project. Such an alternative would meet a refined Basic Objective 1 and well as Basic Objectives 2 and 3. Such a reduced scope would also have a lesser environmental impact than either the Proposed Project of the Phased Build Alternative

ORA supports the DEIR's acknowledgement that the interconnection queue is not measure of what generation projects may materialize. ORA also supports the DEIR in considering alternatives that have reduced environmental impact while still meeting California's needs. However, there has not been sufficient demonstration that a transmission capacity increase is needed or why a project of reduced scope that simply maintains the current transmission capacity is not only adequate but also provides margins for future uses.

A6-6

Therefore, ORA recommends: (1) a congestion analysis be used in the power system studies to determine the value of upgrading the transmission system west of the Devers substation; and (2) an evaluation of an additional project alternative that maintains the existing system capability by restricting the WODUP scope of work to that portion of the transmission system which transverses the Morongo lands.

<sup>35</sup> Queue 365 is identified as a 500 MWW solar thermal project. The CAISO queue identifies the Proposed Project as connecting to Red Bluff substation. Because solar thermal projects of this size are permitted by the CEC, the Palen project is the only project that meets these parameters.

<sup>36</sup> See CPUC RPS Monthly Project Status Tbl (updated Aug. 20, 2015), available at <http://www.cpuc.ca.gov/PUC/energy/Renewables/>.

## Responses to Comment Set A6 – CPUC Office of Ratepayer Advocate

- A6-1 This comment from ORA first summarizes the alternatives presented in the Draft EIR/EIS. The commenter supports the Draft EIR/EIS with the position that the CAISO queue includes a large number of generation projects that will likely never be constructed and that the Proposed Project would result in transmission capacity exceeding identified need. The comment disagrees with certain aspects of the Draft EIR/EIS, and these are addressed in detail in the subsequent individual comments.
- A6-2 The comment states that congestion should be used as a metric in determining whether the Proposed Project would be needed and reasonable. See General Response GR-1 for information on the question of project need in the context of the environmental review process. The ORA is a party to the CPUC proceeding, and as such, ORA may address the topic of the need for the Proposed Project in the CPUC evidentiary hearing. Although congestion may be a reasonable metric, rather than a consideration of deliverability, the EIS recognizes that a basic objective of the Proposed Project is to increase the power transfer capability of the West of Devers transmission facilities to interconnect and fully deliver the electrical power from planned generation resources (Section A.2.1.4, Interconnecting Planned Generation Resources). As noted in GR-1, the EIS does not define any specific level of need for the Proposed Project because such a discussion is not appropriate in the NEPA context.
- A6-3 This comment states that California does not need system capacity and that the value of solar generation may diminish in future years. The comment presents information on the level of generation that has received power purchase agreements (PPAs) and information on options available to generators as “energy-only” projects, rather than seeking or receiving Full Capacity Deliverability Status (FCDS).
- The EIS recognizes that planned generation resources could be designated as “energy-only” although most do not pursue this option. Because of the tendency of generators to pursue deliverability and FCDS, the EIS includes an in-depth discussion of the transmission system improvements that could be implemented as alternatives to the project and in the No Project/No Action Alternative Scenario (Section C.6.3). As noted above, the EIS does not define any specific level of need for the Proposed Project because such a discussion is not appropriate in the NEPA context. The question of whether the Proposed Project is needed is clearly within the scope of the CPUC evidentiary hearing. No additional EIS analysis would be necessary. Please also see General Response GR-1.
- A6-4 The comment reiterates the position that congestion should be used as a metric in determining the need for transmission capacity. Please see Response to Comment A6-2.
- A6-5 The comment recommends using a production cost simulation model as the tool in determining the need for transmission capacity. As noted above, the EIS does not define any specific level of need for the Proposed Project. The power flow analysis in the EIS need not include a formal study of deliverability or a security-constrained production cost simulation, as suggested by the comment. Conducting these types of studies would be beyond the scope of the EIS, which focuses on determining whether the project and alternatives are feasible. Please also see General Response GR-1.

- A6-6      The comment claims that the power flow study in the Draft EIR/EIS overestimates the level of transmission capacity needed for the West of Devers corridor. As noted above, the EIS does not define any specific level of need for the Proposed Project. The purpose of the power flow modeling presented in the Draft EIR/EIS was limited to assessment of the ability of the Proposed Project and the Phased Build Alternative to meet Basic Project Objective 1. General Response GR-2 (Agency-defined Basic Project Objectives) notes that the power flow analysis in the EIS does not include a formal study of deliverability. The power flow modeling analysis compared the Proposed Project with the Phased Build Alternative in different power flow scenarios, and the purpose of the analysis was to assess whether the Proposed Project and Phased Build Alternative could feasibly satisfy various levels of potential generation and scenarios of system operation.
- The comment also presents information on the level of generation that has requested review for interconnection purposes and the level of generation identified within power flow modeling cases and within the CAISO annual Transmission Planning Process. The comment uses this information in support of the position that California does not need system capacity. This topic is addressed in Response to Comment A6-3.
- A6-7      The commenter disagrees with Basic Project Objective 1 and setting a goal to increase deliverability by at least 2,200 MW because the commenter asserts that no congestion study documents a need for this level of additional capacity. The rationale for selecting each of the CPUC and BLM Basic Project Objectives is presented in EIS Section A.2.3, and General Response GR-2 provides a discussion of the agency-specific Basic Project Objectives.
- The commenter believes that the existing system, including the 2013 West of Devers Interim Project, would be adequate as an alternative to the Proposed Project, and that the existing system capacity is sufficient, in light of the documented demand. The comment recommends that this concept be considered as an EIS alternative.
- In consideration of the comment, the EIS now includes a new alternative, the “Retain WOD Interim Facility Alternative.” It is evaluated in EIS Appendix 5 (Alternatives Screening Report), Section 5.13, and also in Section C.5.12, as an alternative that has been considered but eliminated from detailed evaluation because it would not meet the Basic Project Objectives.
- A6-8      The commenter indicates that the “Retain WOD Interim Facility Alternative” would reduce environmental impacts when compared with the Proposed Project or the Phased Build Alternative. However, the alternative recommended in the comment would not meet the Basic Project Objectives. Please see Response to Comment A6-7.
- A6-9      Please see Responses to Comments A6-2 and A6-7.

Comment Set A7 – U.S. Fish & Wildlife Service



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Ecological Services  
Palm Springs Fish and Wildlife Office  
777 East Tahquitz Canyon Way, Suite 208  
Palm Springs, California 92262



In Reply Refer To:  
FWS-SB-WRIV-14B0011-15CPA0335

OCT - 9 2015

Billie C. Blanchard, California Public Utilities Commission, Project Leader  
Frank McMenimen, Bureau of Land Management, Project Leader  
C/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, California 94104

Subject: Draft Environmental Impact Report for the Southern California Edison West of Devers Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Blanchard and Mr. McMenimen:

The U.S. Fish and Wildlife Service (Service) has reviewed the subject Draft Environmental Impact Report (DEIR) for the proposed Southern California Edison (SCE) West of Devers (WOD) Upgrade Project (Project). The DEIR was prepared to identify the proposed Project's direct, indirect, and cumulative environmental impacts; to discuss alternatives; and to propose mitigation measures that avoid, minimize, or offset significant environmental impacts. The primary concern and mandate of the Service is the protection of public trust fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*). We are providing the following comments as they relate to the Project's effects on wildlife resources and species listed under the Act.

A7-1

The purpose of the proposed Project is to upgrade over 48 miles of SCE's existing 220 kilovolt (kV) transmission lines, associated structures, and telecommunication lines from the Devers substation to the San Bernardino substation. The Project is divided into six segments. The Project includes 1) replacing approximately 562 miles of 220 kV transmission line with 1,199 miles of higher capacity 220 kV lines; 2) upgrade equipment at the Devers, El Casco, Etiwanda, San Bernardino, Timoteo, Tennessee, and Vista substations; 3) remove and replace approximately 598 tower and pole structures with 470 higher capacity structures; 4) relocation of 3 miles of transmission line and right of way (ROW) located on Morongo Tribal lands to the south; 5) removal and relocation of 2 miles of 66 kV subtransmission lines and 4 miles of 12 kV electric distribution lines; 6) the construction of temporary structures and bypass lines to facilitate electrical distribution during the project, 8) the rehabilitation of 130 miles of existing access roads; and 7) the construction of 20 miles of temporary and permanent access roads.

The Project is located primarily within the existing WOD transmission corridor in the counties of Riverside and San Bernardino and through the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, and Redlands. The project's transmission route begins at the Devers substation

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south of Desert Hot Springs, Riverside County, California, and travels west through the San Geronio pass north of Interstate 10 (I-10), through Morongo Tribal Lands (Segments 6, 5, and 4, respectively). The line then crosses the I-10 and follows the San Timoteo Canyon northwest and splits (Segment 4 and 3); one segment terminates to the north at the San Bernardino substation (Segment 1) and the other at the Vista substation south of Colton, San Bernardino County, California; the west edge of Interstate 215 (Segment 2).

A7-1  
cont.

Comments

Impact Analysis of Project Alternatives

The DEIR analyzes five potential project alternatives: the Tower Relocation Alternative, the Iowa Street 66 kV underground Alternative (Iowa Street Alternative), the Phased Build Alternative (PB Alternative), and two No Project/No Action alternatives. These alterations will have varied effects on the biological resources and will be discussed further.

The Tower Relocation Alternative rebuilds 54 towers, 50 feet (ft.) farther from residential areas but within SCE ROW to compensate for visual impacts. This alternative does impact vegetation and wildlife by increasing construction time as well as vegetation removal and ground disturbance in potential coastal sage scrub (CSS) habitat. The Service does not recommend this alternative over the Project as proposed.

A7-2

The Iowa Street Alternative moves the 66 kV sub-transmission line from an overhead line to underground along Iowa Street in the City of Redlands (Figure ES-2). The sub-transmission line would travel 1,600 ft. underground, then transition from underground to overhead on the existing overhead San Bernardino–Redlands-Tennessee 66 kV subtransmission line. This underground alternative would replace a similar length of proposed new over-head subtransmission line that is part of the proposed Project. This alternative would eliminate the permanent loss of habitat at each pole footing and a result in reduction in bird and bat collisions; however, there is an increase in construction impact to biological resources. The alternative requires substantial ground disturbance including open trenching along the length of the alternation for an extended amount of time, increased air pollution due to additional traffic, vegetation clearing, and the alternative may increase non-native invasive plant colonization. The biological resource impact between the proposed project and this alternative is negligible.

A7-3

The PB Alternative (G.4) retains and remodels as many existing double-circuit tower structures as possible and the installation of lighter weight but higher performance conductors on the retained towers; thereby reducing construction and its environmental impacts. However, the retention of old infrastructure decreases capacity of the transmission line and reduces the time until other upgrades are needed; the alternative may provide adequate capacity for 10 years or more. The capacity difference between the proposed Project and this alternative is 1,800 megavolts (MV); the alternative will still comply with the 2024 Reliability Base Case; as shown in Table Ap5.1-6, plus an additional 1,400 MV. This alternative would reduce impacts to several threatened and endangered species while allowing the Project to be completed.

A7-4

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The two No Project/No Action Alternatives (labeled as No Project 1 and No Project 2 respectively) will likely occur in the absence of the proposed Project. Section G.7 examines the impacts to biological resources and finds the No Project/No Action Alternative would have more severe environmental impacts than either the proposed Project or the alternatives considered in the DEIR.

A7-5

No Project Option 1 includes:

1. Remove the current 220 kV transmission line between Devers and El Casco substations, Devers to Vista substations, and Devers to San Bernardino substations.
2. Install approximately 23.5 miles of new 500 kV circuit between Devers and the Valley substations. A new ROW would be required for the transmission line to be established; it would run south of the I-10 through the San Geronio pass, see figure ES-4a.
3. Construct a new substation in the city of Beaumont, which would include a 40 acre ROW.
4. Construct replacement 220 kV line between El Casco to Vista and San Bernardino substations, and two Vista substations.
5. The new transmission line would travel through Bureau of Land Management (BLM) lands, Santa Rose and San Jacinto National Monuments and adjacent to San Bernardino National Forest including designated wilderness.

No Project Option 2 includes:

1. Construction of a new single circuit 500 kV transmission line in the 40.5 mile corridor between the Valley and Serrano substations, see figure ES-4b.
  - a. This route extends through southwest Riverside County and into Cleveland National Forest, Lake Mathews-Estelle Mountain Reserve, western Riverside Multi Species Habitat Conservation Plan (MSHCP) conserved lands, and land managed by the Riverside County Habitat Conservation Agency for Stephen's Kangaroo rat (*Dipodomys stephensii*, SKR).
  - b. Construction would require a helicopter.
2. The WOD transmission line segment between the Outlet Mall and the eastern border of the city of Banning would be removed and a new line and ROW would be constructed south of I-10.

Both No Project Options 1 and 2 have the potential to affect several listed species and their habitats, mostly due to the need to create a new transmission ROW with new tower structures and substations, and access roads. The new transmission line south of the I-10 would require large areas of vegetation removal and ground disturbances as tower structures and roads are constructed in the new ROW. If none

A7-6

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of the proposed project alternatives is adopted and No Project Option 1 or 2 is selected and pursued it would be subject to the appropriate level of environmental analysis.

A7-6  
cont.

Connected Actions

A7-7

There are seven solar projects that depend upon the proposed Project for energy transmission: Palen Solar Electric Generating System II, Desert Harvest LLC, Blythe-Eagle Mountain 161 kV line, Red Bluff Substation 230 kV line, and three additional unnamed solar projects connecting to the Colorado River Substation. The Service has already commented on the Palen Solar Electric Generating System II and the Desert Harvest LLC projects. The other proposed solar projects will need to have their own project level impact analysis under the California Environmental Quality Act and National Environmental Policy Act.

Applicant Proposed Measures

A7-8

The Service has concerns regarding the DEIR and the proposed Project's potential impacts on sensitive flora and fauna. We recommend that the following items be updated and addressed in the FEIR.

Revegetation Plan

Mitigation measure BIO-1 of the DEIR provides for revegetation of temporary disturbance areas and thoroughly lays out the goals and provisions of the revegetation plan. The Service requests the inclusion of language that prohibits the planting of non-native and/or invasive plants and provides for the use of native local seed stock in measure BIO-1. We also recommend that equipment be cleaned between job sites to reduce the spread of invasive plants.

Biological Monitors

A7-9

The DEIR includes measure BIO-2 providing Biological Monitors in areas where special-status species or unique resources are known to occur in the proposed Project, including, at least one dedicated Biological Monitor in active desert tortoise (*Gopherus agassizii*, tortoise) habitat. Given the significant number of State and federally listed and special status-species throughout the project alignment we request that a dedicated Biological Monitor be present any time there is construction where native vegetation is present.

Migratory Birds

A7-10

The DEIR includes measure Nesting Birds BIO-3 to address potential impacts to breeding birds, which includes the development of a Nesting Bird Management Plan. SCE's has worked with us and others to complete the Nesting Bird Management Plan. We appreciate the coordination and effort to complete the plan and recommend that it be included in the FEIR as an appendix.



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Golden Eagle

A7-11

The Golden Eagle (*Aquila chrysaetos*) is a State fully protected species, and is federally protected under the MBTA and under Executive Order 13186 - Responsibility of Federal Agencies to Protect Migratory Birds. In addition to MBTA, eagles are protected under the Bald and Golden Eagle Protection Act (BGEPA). Under the BGEPA statute, "take" is defined as "pursue, shoot at, poison, wound, kill, capture, trap, collect, or molest or disturb" (50 C.F.R. § 22.3). "Disturb" is defined as "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle; 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior; or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

The DEIR states that the golden eagles were observed foraging and nesting within 1.5 to 5 miles of the ROW in a 2013 survey in all segments save for segments 1 and 2. Because there are recent records of golden eagles in the proposed project area and the presence of suitable habitat, we strongly recommend pre-construction survey for eagles within a 10-mile buffer of the project site. If golden eagles are found to be using areas within the survey area, avoidance measures will need to be incorporated into the FEIR.

Burrowing Owl

A7-12

The DIER cited the need for SCE to develop a Burrowing Owl Management Plan. The Service agrees that a management plan is necessary. Focused surveys were conducted for the species in 2010, 2011, 2012, and 2013; owls and burrows were found within the project's ROW. The Burrowing Owl Management Plan should place a strong emphasis on ensuring that, to the greatest extent feasible, burrowing owls are not evicted from or otherwise caused to lose the use of occupied burrows. Maximum effort should be directed at ensuring that burrows are not lost to project development. The project should then be constructed such that occupied burrows are buffered from disturbance.

BIO-4 proposed measures to avoid impacts to burrowing owls including the establishment of buffers determined by an avian biologist. The Service recommends buffers to be set at no fewer than 500 ft.

Desert Tortoise

A7-13

The DEIR included several measures to avoid impact to tortoise. The portion of the alignment identified in the DEIR as tortoise habitat extends from the Devers substation west to Deep Creek Road, and after review of satellite imagery of the area, the Service recommends extending the tortoise habitat area to Mathews Road, approximately 2.62 miles to the west to fully cover tortoise habitat.

The Service requests that the following be included in the FEIR:

1. A sensitive resource education program should be presented to all personnel who will be working on the project, including staff, surveyors, construction engineers, contractors, supervisors, inspectors, and visitors.



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- a. The program will include briefing sessions and handouts developed by biologists familiar with the biological requirements of tortoise.
  - b. The program will cover tortoise distribution, general behavior, ecology, sensitivity to human activities, legal protection, penalties for violation of State and Federal laws, reporting requirements, and project avoidance measures.
  - c. The program will identify fire prevention measures to be implemented by employees during project activities.
2. Important features, such as burrows, within 300 ft. of the project area will be flagged to alert biological and work crews to their presence.
    - a. Prior to the beginning of each work day, all personnel will be briefed on locations of the flagged avoidance areas.
    - b. Only authorized biologists will be allowed to enter flagged areas.
  3. Previously disturbed areas within the ROW will be used for the stockpiling of excavated materials, storage of equipment, and parking of vehicles when possible. The authorized biologist will review and survey any area to be used for stockpiling of material and parking prior to use.
    - a. The authorized biologist will work with the field contact representative to select appropriate sites that minimize affect. The area of disturbance will be confined to the smallest practical area, considering topography, placement of facilities, and location of burrows.
    - b. Work area boundaries will be delineated with flagging to avoid surface disturbance associated with vehicle straying.
  4. Equipment and vehicle operators will watch for desert tortoise when driving.
    - a. Vehicle speeds will not exceed 20 miles per hour to allow for adequate visibility.
    - b. Biological Monitors provide clearance for tortoise when heavy equipment is driven or tracked to new areas of the proposed project or areas that have not been actively in construction.
  5. SCE shall restrict work to daylight hours, except during an emergency, in order to avoid nighttime activities when desert tortoise may be more active and possibly present on roads/trails.

A7-13  
cont.

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6. All project vehicles in desert tortoise habitat will only use existing roads and trails. An authorized biologist will conduct tortoise surveys immediately prior to the onset of system road maintenance in desert tortoise habitat.
7. Trenches or other excavations will be fenced with temporary desert tortoise-proof fencing, or covered at the close of each working day. All excavations will be inspected for tortoises prior to backfilling.
8. Dust control watering within tortoise habitat will be conducted in a manner that does not result in the pooling of water. In the event of pooling, these areas will be checked on a regular basis for the presence of tortoise. If a tortoise is attracted to the water, an authorized biologist will capture and relocate the animal and the individual will be monitored to ensure it does not return to the pooled water.
9. Project personnel will not be permitted to bring pets to the worksites.
10. During project activities, all trash at project sites shall be removed from work sites or completely secured at the end of each work day in common ravens (*Corvus corax*, raven) proof trash containers.
  - a. This will reduce the potential for attracting tortoise predators and the opportunity for tortoises to ingest trash and toxins.
  - b. Any road kill found in the vicinity of the work site should be disposed of in raven-proof containers then removed from the site each day.
11. Observations of tortoises and their sign during project activities will be conveyed to the field contact representative or authorized biologist immediately.
12. We recommend that the agencies require the development of an on-site management plan to eliminate or minimize ravens. We also recommend the installation of tubular steel poles instead of lattice structures to reduce the surfaces upon which common ravens could perch, roost, or nest.

A7-13  
cont.

Least Bell's Vireo, Southwestern Willow Flycatcher, and Western Yellow-billed Cuckoo

BIO-6 of the DEIR examines avoidance measures for Least Bell's Vireo (*Vireo bellii pusillus*, vireo), Southwestern Willow Flycatcher (*Empidonax traillii extimus*, flycatcher), and Western Yellow-billed Cuckoo (*Coccyzus americanus*). The measure states, "SCE avian biologist would establish a buffer where construction activities are prohibited around active vireo [or other listed riparian bird] nest(s)...the buffer would be established and may be subsequently adjusted." We recommend the buffer be no less than 300 ft. at all times.

The proposed measure states, "temporary and permanent impacts to least Bell's vireo and its habitat that may occur in Segments 3 and 4 would be mitigated by obtaining an incidental take authorization." We

A7-14

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would clarify that obtaining a permit is not mitigation and request that a mitigation strategy be included in the FIER.

A7-14  
cont.

Special Status Plants

A7-15

The DEIR includes a section for measures to avoid impact to Special Status Plants BIO-7; we appreciate the scope and detail of these measures.

Nevin's Barberry

A7-16

Nevin's Barberry (*Berberis nevinii*, barberry) has been found near the ROW in Segment 3 and San Bernardino Junction. Surveys should be conducted for barberry before the beginning of construction and an avoidance strategy should be included in the FEIR. Barberry is a shrub with very limited distribution; every effort should be made to avoid impacts to individuals of this species.

Triple-ribbed Milk-Vetch

A7-17

Triple-ribbed milk-vetch (*Astragalus tricarlinatus*) has been documented near Whitewater Wash within or near the ROW. We request that the FEIR include pre-construction surveys and avoidance measures.

Coastal California Gnatcatcher

A7-18

Mitigation measure BIO-10 contains avoidance measures for the coastal Californian gnatcatcher (*Poliophtila californica californica*, gnatcatcher). It includes pre-construction surveys in areas containing CSS and designated critical habitat areas in San Bernardino County, but defers the development of mitigation measures for impacts to the gnatcatcher or its designated critical habitat to a future consultation under section 7 of the Act. We recommend that impacts to gnatcatcher and its critical habitat be avoided. If avoidance is not possible, a strategy for mitigating unavoidable impacts to gnatcatcher and its habitat should be included in the FEIR.

BIO-10 also states, "restoration of temporary impacted coastal sage habitat; and additional restoration of degraded areas within the SCE right-of-way as compensation for permanent impacts to coastal sage habitat, such that there is no net loss of habitat value for coastal California gnatcatcher". The DEIR does not identify the area of habitat to be temporarily or permanently impacted by project activities. The Service requests a complete description of the area and location of impacted CSS habitat and identification of the amount and location of degraded CSS to be restored be included in the FEIR.

Stephen's Kangaroo Rat

A7-19

The DEIR recognized the potential for SKR to be present within the project area. We are concerned that direct effects to SKR could also occur from excavation and construction activities in occupied SKR habitat. SKR and other kangaroo rats often create burrows along road edges because of the bare ground they provide (Thomas 1975). Grading, stabilization, and road leveling could result in impacts to the SKR by causing loss or alteration of their habitat, but the DEIR doesn't provided avoidanc measures to

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avoid or minimize these impacts. We ask that road maintenance and clearing measures (Best Management Practices) be developed for SKR including:

1. Limiting road repairs to daylight hours;
2. Minimize vehicle traffic outside of establish dirt roads;
3. When vehicle travel off of established roads cannot be avoided, in occupied SKR habitat, the vehicles will drive on sheets of plywood to distribute the weight of the vehicle and minimize the collapse of burrows.
4. Employ road grading techniques which create little or no berm on the roadsides;
5. Do not borrow material for road repair within occupied habitat; instead designate borrow sites in areas not occupied by SKR (as demonstrated by negative trapping results);
6. Do not import material from outside the area that may contain weeds; and
7. For the class “roads need improvement” and other areas needing repair, a permitted biologist will survey for kangaroo rat sign, and if found, SKR will be trapped, held during the road repair, and then released back onto the site.

BIO-11 states that a qualified biologist will check construction pipes, poles, culverts, or similar structures for SKR when such material is left out uncovered overnight. We appreciate this measure and the overall thoroughness of the analysis. The service does request this measure be extended to any piles of soft compacted or non-compacted dirt left at construction sites within SKR habitat, as SKR will create burrows in these areas.

### Vernal Pool Fairy Shrimp and Spreading Navarretia

Vernal pool habitat suitable for western spadefoot toads (*Spea hammondi*, toad), also provide habitat for listed vernal pool species, including the threatened vernal pool fairy shrimp (*Branchinecta lynchi*, fairy shrimp) and *Navarretia fossalis* (spreading Navarretia). The DEIR noted several areas of suitable pond habitat and the presents of the toads or tadpoles, these areas should be assessed for the potential to pond water prior to ground disturbing activities. The FEIR should include avoidances measures for fairy shrimp and spreading Navarretia. If evidence of ponding or areas which support ponding is detected in the ROW, these areas should be avoided. If they cannot be avoided, then surveys for fairy shrimp and vernal pool plant species should be conducted prior to ground disturbance or vegetation removal.

### Unauthorized Access

Dirt and gravel roads leading to and in the pipeline ROW can result in unauthorized uses such as operation of off-highway vehicles in closed areas, dumping, and target shooting. These activities can impact federally listed and special status species and their habitat, including rare plant communities. We

A7-19  
cont.

A7-20

A7-21

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would appreciate the inclusion of a Vehicle Access Management Plan (VAMP) for all existing and planned roads. The VAMP would include measures such as signs, gates, locks, and fences to deter unauthorized use before, during, and after construction. We also ask that the VAMP include measures which provide for the ongoing, regular inspection and repair of the fences, gates, locks, and signs installed to prevent unauthorized use.

A7-21  
cont.

Incidental Take

The DEIR mentions SCE's intent to obtain incidental take authorization for the gnatcatcher, vireo, and SKR. If incidental take cannot be avoided, it must be authorized under section 7 or section 10 of the Act. The Project alignment traverses three regional habitat conservation plans: the Stephens' Kangaroo Rat Habitat Conservation Plan, the Western Riverside County Multiple Species Habitat Conservation Plan, and the Coachella Valley Multiple Species Habitat Conservation Plan. If the Project cannot avoid incidental take of listed species covered by one or more of those plans, SCE can pursue a Certificate of Inclusion under the appropriate plan or plans to receive incidental take authorization. In order to obtain a Certificate of Inclusion the project and SCE would need to implement the relevant habitat conservation plan. Coordination with the Regional Conservation Authority (RCA), the Coachella Valley Conservation Commission (CVCC), and or the Riverside County Habitat Conservation Agency would be required. Implementation of the multiple species plans may require consideration of non-listed species.

A7-22

We appreciate the opportunity to comment on the DEIR. If you have questions regarding this letter, please contact Amanda Swaller of the Service at 760-322-2070, extension 204.

Sincerely,



Kennon A. Corey  
Assistant Field Supervisor

cc: Jeff Brandt, CDFW, Ontario

LITERATURE CITED

Thomas, J.R. 1975. Distribution, population densities, and home range requirements of the Stephen's kangaroo rat (*Dipodomys stephensi*). M. A. thesis, California State Poly. Univ., Pomona.

## Responses to Comment Set A7 – U.S. Fish & Wildlife Service

- A7-1 This introductory text summarizes the Proposed Project, and does not require a response.
- A7-2 The commenter states that the Tower Relocation Alternative creates impacts by increasing construction time and vegetation removal and ground disturbance in coastal sage scrub habitat. The USFWS does not recommend this alternative over the Proposed Project. USFWS's preference is acknowledged.
- Vegetation impacts from the Tower Relocation Alternative are discussed in Section D.4.4.1 (Biological Resources – Vegetation, Tower Relocation Alternative) under Impact VEG-1 (Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats).
- As with the Proposed Project, construction, post-construction restoration, and O&M activities for the Tower Relocation Alternative would necessitate temporary and permanent removal of vegetation and habitat as shown in Table D.4-4 (Maximum Potential Permanent and Temporary Vegetation Removal) of the EIS. The EIS concludes that the adverse effect on vegetation and habitat due to land clearing for this alternative would be similar to the Proposed Project. There may be minor differences in total acreages of habitat types impacted, but they would not exceed the amounts analyzed for the Proposed Project. Impacts to vegetation and habitat would be reduced through implementation of Mitigation Measures VEG-1a (Conduct biological monitoring and reporting), VEG-1b (Prepare and implement worker environmental awareness program [WEAP]), VEG-1c (Minimize native vegetation and habitat loss), VEG-1d (Restore or revegetate temporary disturbance areas), and VEG-1e (Compensate for permanent habitat loss).
- A7-3 The commenter states that the difference in biological impacts between the Proposed Project and the Iowa Street Underground Alternative is negligible. This observation by the USFWS is acknowledged.
- A7-4 The commenter notes that the Phased Build Alternative would reduce impacts to threatened and endangered species while allowing the Project to be completed. This comment is acknowledged.
- A7-5 This text summarizes the component of the No Project/No Action Alternatives, and does not require a response.
- A7-6 USFWS is correct that if either of the No Project/No Action Options were to be pursued, they would be subject to appropriate environmental analysis.
- A7-7 USFWS is correct that each of the Connected Action projects would be subject to individual project-level analysis prior to approval or implementation. The analysis of Connected Actions is included in this EIS in order to disclose the potential impacts of these connected projects to the decisionmakers that are considering approval of the WOD Upgrade Project.
- A7-8 The commenter requests that planting of non-native or invasive plants be prohibited and equipment be cleaned between job sites to prevent spread of invasive plants, and cites what the commenter identifies as Mitigation measure BIO-1.
- (Note of clarification: The commenter misidentifies BIO-1 and other measures beginning with the BIO prefix. These are Applicant Proposed Measures (APMs) proposed by SCE and

not EIS mitigation measures. Mitigation measures for vegetation are identified with the prefix VEG- and for wildlife with the prefix WIL-. For example, Mitigation Measures VEG-1a, VEG-1b, VEG-2a, WIL-1a, etc.)

As stated in Section D.5.3.1.1 (Biological Resources, Applicant Proposed Measures) the Biological Resources APMs have been superseded by mitigation measures that add requirements and provide details not found in the APMs. Applicant Proposed Measure (APM) BIO-1 (Revegetation Plan) is superseded by Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) in the EIS.

Mitigation Measure VEG-1d would require SCE to prepare and implement a Habitat Restoration and Revegetation Plan (HRRP), to restore or revegetate all temporary disturbance areas. Mitigation Measure VEG-1d would require the HRRP to incorporate planting and seeding palettes to include only native, locally sourced materials. Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) in the EIS would require vehicles, equipment, and tools to be inspected and cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes before entering or moving between areas of the project right-of-way (ROW).

- A7-9 The commenter notes that there are a number of listed and special-status species throughout the project alignment and recommends a biological monitor be present any time there is construction where native vegetation is present.

As stated in Section D.5.3.3.1 (Applicant Proposed Measures), all of the Biological Resources APMs have been superseded by mitigation measures that add requirements and provide details not found in the APMs. APM BIO-2 (Biological Monitoring) is superseded by Mitigation Measure VEG-1a in the EIS. Mitigation Measure VEG-1a requires biological monitoring of all work activities in any area where there is a potential to impact sensitive biological resources (including native vegetation) and including listed and special-status species.

- A7-10 The commenter notes that SCE has worked with USFWS and others to develop a Nesting Bird Management Plan (NBMP) and recommends that the NBMP be included in the Final EIS as an appendix.

Mitigation Measure WIL-1c (Prepare and implement a Nesting Bird Management Plan) requires preparation of a project-specific NBMP and specifies the contents and requirements of that NBMP. In order to ensure timely completion of the NBMP, CPUC and SCE convened a technical working group (TWG) of SCE, BLM, CPUC, CDFW, and USFWS biologists to prepare the NBMP. The TWG held a series of meetings to outline the necessary NBMP contents, and then to review and revise several working draft versions of the NBMP. The final NBMP is included with the Final EIS as Appendix 14. The final NBMP reflects the input and discussion of each TWG member to effectively manage nesting birds. The final NBMP includes some minor departures from Mitigation Measure WIL-1c as presented in the Draft EIR/EIS. Text of Mitigation Measure WIL-1c has been revised in the Final EIS to add default nest buffers and ensure conformance with the NBMP.

- A7-11 The commenter notes that golden eagle has been observed nesting and foraging with five miles of the ROW and recommends pre-construction surveys and avoidance measures.



In preparing the response to this comment and Response to Comment F3-185 from Southern California Edison, Aspen contacted the USFWS to confirm its recommendations regarding golden eagle avoidance. Mitigation Measure WIL-2f (Conduct surveys and avoidance for golden eagle) requires pre-construction golden eagle surveys and avoidance measures, but it has been revised in the Final EIS with guidance from USFWS as follows.

The text of Mitigation Measure WIL-2f has been revised in the Final EIS to remove the requirement for winter surveys, reduce the survey buffer to 2 miles on either side of the transmission line, delete the permit requirement, and remove the requirement for a monitoring and adaptive management plan. Mitigation Measure WIL-2f retains the requirement for nesting season surveys using methods described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. A requirement for a one mile line-of-sight and one-half mile no line-of-sight buffer for active eagle nests has been added to Mitigation Measure WIL-2f, and the measure retains the requirement for adaptive management if there is any evidence of project-related disturbance to nesting golden eagles. The revised measure is substantially comparable to Mitigation Measure WIL-2f in the Draft EIR/EIS in that it specifies a buffer distance and specifies monitoring and adaptive management requirements, both based on most current guidance from the USFWS, and would avoid or minimize impacts to golden eagle. No take of golden eagle is anticipated and therefore no permit would be required.

- A7-12 The commenter recommends a burrowing owl management plan and burrowing owl buffers be set at no less than 500 feet.

As stated in Section D.5.3.1.1, all Biological Resources APMs have been superseded by mitigation measures that add specific requirements and provide details not found in the APMs. APM BIO-4 (Burrowing Owl) is superseded in the EIS by Mitigation Measure WIL-2g (Conduct surveys and avoidance for burrowing owl). Buffers for burrowing owl are established by the NBMP, as specified in Mitigation Measure WIL-1c (Prepare and implement a Nesting Bird Management Plan). The NBMP specifies default buffers for burrowing owl as 300 feet for ground construction, and 300 feet horizontal and 200 feet vertical for helicopter construction. In addition, SCE will prepare and implement a plan to avoid impacts to burrowing owl, to be appended to the NBMP. The text of Mitigation Measure WIL-2g has been revised to include the default buffers listed above. A buffer of 500 feet is not necessary to avoid and minimize impacts to the resource.

- A7-13 The commenter makes a number of recommendations regarding desert tortoise. Each is presented below, followed by responses to each item.

- a. Extend western boundary of tortoise habitat area from Deep Creek Road to Mathews Road, 2.62 miles to the west.

Protocol surveys were done for desert tortoise on project Segments 5 and 6 in 2011, 2012, and 2013. Desert tortoise and tortoise sign were found on the east end of Segment 5, east of Deep Creek Road. No sign was observed west of Deep Creek Road. Although no desert tortoise sign was observed west of Deep Creek Road, Mitigation Measure WIL-2a (Conduct desert tortoise surveys, monitoring, and avoidance) would require biological monitoring of construction activities in all areas with the potential to support desert tortoise.



- b. Include a sensitive resource education program in the Final EIS to include information on desert tortoise and fire prevention.

Mitigation Measure VEG-1b (Prepare and implement a Worker Environmental Awareness Program (WEAP)) would require preparation and implementation of a project-specific WEAP to educate on-site workers about the Proposed Project's sensitive environmental issues, including desert tortoise and fire prevention and protection measures.

- c. Flag tortoise burrows and other important features within 300 feet of the project area and alert construction crews to avoid these areas.

As stated in Section D.5.3.1.1 of the EIS, all of the Biological Resources APMs have been superseded by mitigation measures that add requirements and provide details not found in the APMs. Mitigation Measure WIL-2a (Conduct desert tortoise surveys, monitoring, and avoidance) supersedes APM BIO-5 (Desert Tortoise) in the EIS. Mitigation Measure WIL-2a would require surveys for desert tortoise burrows and pallets in disturbance areas and a surrounding buffer of 100 feet within suitable habitat. Tortoise burrows and pallets encountered within the disturbance area (if any) would be conspicuously flagged by the surveying biologist(s) and avoided during construction activities.

- d. Conduct surveys of areas to be used for parking and stockpiling and delineate work area boundaries with flagging to avoid vehicle straying.

Please see Response to Comment A7-13, part c. Mitigation Measure VEG-1c (Minimize native vegetation and habitat loss). This measure requires that, prior to any construction, equipment or crew mobilization at each work site, work areas will be marked with staking or flagging to identify the limits of work. Staking and flagging will clearly indicate the work area boundaries.

- e. Watch for desert tortoise when driving, keep vehicle speeds below 20 mph, and have biological monitors clear for tortoise when heavy equipment is driven to new areas of the project.

Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) would require a maximum 15 mile per hour vehicle speed limit on access roads within the ROW and project vicinity. Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) would require biological monitoring of all activities in any area where there is a potential to impact sensitive biological resources, including desert tortoise. Mitigation Measure WIL-2a (Conduct desert tortoise surveys, monitoring, and avoidance) would require project personnel to inspect for desert tortoises under parked vehicles or equipment prior to moving.

- f. Restrict work to daylight hours.

It is expected that work will occur primarily during daylight hours. As noted in Section B.3.1 (Description of the Proposed Project, General Construction), it is not anticipated that lighting would be used at construction sites unless a permit condition, an outage requirement, critical work activity, and/or an emergency situation would require work to be conducted during off hours. Mitigation measures to avoid and minimize impacts

to wildlife, including Mitigation Measure WIL-2a (Conduct desert tortoise surveys, monitoring, and avoidance), would apply at night as well as during the day.

- g. Use only existing roads and trails. Conduct tortoise surveys prior to road maintenance.

Mitigation Measure VEG-1c (Minimize native vegetation and habitat loss) would require final engineering of the project to minimize the extent of disturbance, including disturbance for new access roads. All work activities, vehicles, and equipment will be confined to approved roads and staked and flagged work areas. Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) would require biological monitoring of all activities in any area where there is a potential to impact sensitive biological resources, including desert tortoise. Mitigation Measure WIL-2a (Conduct desert tortoise surveys, monitoring, and avoidance) would require desert tortoise surveys prior to construction within suitable habitat. Surveys would include 100 percent of the area to be disturbed and a surrounding buffer of 100 feet.

- h. Fence or cover trenches and other excavations. Inspect excavations for tortoise before backfilling.

Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) would require that excavations be secured to prevent wildlife entry and entrapment. Holes and trenches shall be securely covered, or fenced. Excavations that cannot be fully secured shall incorporate appropriate wildlife ramp(s) to allow trapped animals to escape. At the end of each work day, a biological monitor shall ensure that excavations have been secured or provided with appropriate means for wildlife escape.

Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) would require that biological monitors daily inspect construction areas where animals may have become trapped and release any trapped animals.

Mitigation Measure WIL-2a (Conduct desert tortoise surveys, monitoring, and avoidance) would require that desert tortoise shall be handled only by a USFWS/CDFW permitted and authorized biologist (Authorized Biologist) following appropriate USFWS protocols and in compliance with appropriate regulatory permits. A biological monitor shall monitor construction activities in all areas with the potential to support desert tortoise.

- i. Avoid pooling of water during dust control watering. Check areas of pooling for tortoise and relocate tortoise as needed.

Mitigation Measure WIL-2a (Conduct desert tortoise surveys, monitoring, and avoidance) would require that if a desert tortoise is found in a work area, the tortoise shall be allowed to passively traverse the site while construction in the immediate area is halted. If the tortoise does not move out of harm's way after 20 minutes, the tortoise may be moved by an Authorized Biologist, subject to conditions and authorization by CDFW and USFWS.

Mitigation Measure WIL-2b (Prepare and implement Raven Monitoring, Management, and Control Plan) would require preparation and implementation of a Raven Management Plan to include identification of project activities that could provide predator subsidies or attractants, including potential pooling from leaks, dust control, or wastewater, and management practices to avoid or minimize those conditions.

- j. Do not allow pets in worksites.

Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) would prohibit workers from bringing pets to the project site.

- k. Remove or secure trash. Remove road kill.

Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) would require that all trash and food-related waste be contained in vehicles or covered trash containers and removed from the site regularly. Dead animals of non-special-status species found on unpaved project roads, work areas, or the ROW shall be reported to the appropriate local animal control agency within 24 hours. A biological monitor shall safely move the carcass out of the road or work area and secure it as needed.

Mitigation Measure WIL-2b (Prepare and implement Raven Monitoring, Management, and Control Plan) would require preparation and implementation of a Raven Management Plan to include identification of project activities that could provide predator subsidies or attractants, including road killed animals, and management practices to avoid or minimize those conditions.

- l. Immediately communicate observations of tortoise or tortoise sign to authorized biologist.

The text of Mitigation Measure WIL-2a (Conduct desert tortoise surveys, monitoring, and avoidance) has been revised in the Final EIS to include the requirement for a biological monitor to immediately notify the Authorized Biologist if a desert tortoise or sign is observed.

- m. Develop a raven management plan.

Mitigation Measure WIL-2b (Prepare and implement Raven Monitoring, Management, and Control Plan) would require the preparation and implementation of a Raven Monitoring, Management, and Control Plan (Raven Plan), consistent with USFWS raven management guidelines, to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, restoration, and Operations and Maintenance (O&M) phases.

- n. Utilize tubular steel poles instead of steel lattice towers to minimize raven perching, roosting, and nesting sites.

The USFWS preference for tubular steel poles over lattice structures is acknowledged. The decision on what structure types to use at various locations must balance geotechnical and design needs, as well as various environmental considerations, such as biological and visual impacts.

- A7-14 The commenter requests that a mitigation strategy for least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo be included in the Final EIS and recommends a buffer around active nests of no less than 300 feet.

As stated in Section D.5.3.1.1, all Biological Resources APMs have been superseded by mitigation measures that add requirements and provide details not found in the APMs. APM BIO-6 (Least Bell's Vireo, Southwestern Willow Flycatcher, & Western Yellow-billed Cuckoo) is superseded in the EIS by Mitigation Measure WIL-2c (Conduct surveys and avoidance for threatened or endangered riparian birds). Mitigation Measure WIL-2c

provides a mitigation strategy for threatened or endangered riparian birds and would require a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter buffer to be established around active nests of threatened or endangered riparian birds.

A7-15 USFWS notes that the discussion of Special Status Plants (Impact BIO-7) is appropriately detailed. No response is required. It should be noted that Mitigation Measure VEG-4a would incorporate and supersede APM BIO-7 and APM BIO-8 by providing additional detail on pre-construction surveys and either avoidance (through design modifications) or detailed procedures to replace or offset special-status plant occurrence that cannot be avoided.

A7-16 The commenter states that pre-construction surveys should be conducted for Nevin's barberry and the Final EIS should include an avoidance strategy.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) would require pre-construction focused surveys for federal- and state-listed and other special-status plants, including Nevin's barberry and triple-ribbed milk-vetch. Mitigation Measure VEG-4a also specifies mitigation for impacts to listed and special-status plants, including avoidance.

A7-17 The commenter states that pre-construction surveys should be conducted for triple-ribbed milk-vetch and the Final EIS should include an avoidance strategy.

Please see Response to Comment A7-16.

A7-18 The commenter recommends that impacts to coastal California gnatcatcher be avoided. If avoidance is not feasible, a mitigation strategy should be included in the Final EIS. The comment also requests that the Final EIS include a complete description of the area and location of impacted coastal sage scrub (CSS) habitat and identification of amount and location of CSS habitat to be restored.

As stated in Section D.5.3.1.1, all Biological Resources APMs have been superseded by mitigation measures that add requirements and provide details not found in the APMs. APM BIO-10 (Coastal California Gnatcatcher and Designated Critical Habitat) is superseded in the Final EIS by Mitigation Measure WIL-2e (Conduct surveys and avoidance for coastal California gnatcatcher). Mitigation Measure WIL-2e provides a mitigation strategy for coastal California gnatcatcher (CAGN), including avoidance.

Regarding CSS habitat that would be impacted by the Proposed Project, Table D.5-5 provides potential impacts to CSS habitat within CAGN critical habitat. Table D.4-4 lists the maximum potential permanent and temporary vegetation removal for the project by habitat types and segment. Figure Ap.7-1 in Appendix 7 shows CAGN critical habitat on the project ROW and Figure Ap.7-2 shows CSS habitat on the project ROW.

The amount and location of CSS habitat to be restored has not yet been determined. Take of CAGN breeding and foraging habitat and incidental take of gnatcatcher nests, eggs, and nestlings would be covered within the WR-MSHCP area if SCE becomes a Participating Special Entity and implements the requirements of the WR-MSHCP. Potential impacts to CAGN and its habitat, including designated critical habitat, in San Bernardino County requires Section 7 Consultation and may require incidental take authorization. Potential impacts within the reservation require Section 7 Consultation and may require incidental take authorization.

In addition, Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) would require preparation and implementation of a Habitat Restoration and Revegetation Plan to replace the habitat values present prior to disturbance. Mitigation Measure VEG-1e (Compensate for permanent habitat loss) would require compensation for permanent or long-term habitat loss through off-site habitat acquisition and management or through participation in an approved in-lieu fee compensatory mitigation bank.

A7-19 The commenter recommends a number of measures to avoid impacts to Stephens' kangaroo rat (SKR). Each is presented below, followed by responses to each item.

- a. Grading, stabilization, and road leveling could result in impacts to Stephens' kangaroo rat (SKR), but the Draft EIR/EIS does not provide avoidance measures.

As stated in Section D.5.3.1.1, all Biological Resources APMs have been superseded by mitigation measures that add requirements and provide details not found in the APMs. APM BIO-11 (Stephens' Kangaroo Rat) is superseded in the EIS by Mitigation Measure WIL-2d (Conduct surveys and avoidance for Stephens' kangaroo rat). Mitigation Measure WIL-2d would require pre-construction surveys for SKR sign, and focused trapping surveys if sign is present. If SKR are present, then additional measures shall be implemented to prevent or minimize take, such as installation of exclusion fences or other measures, subject to authorization by USFWS and CDFW.

- b. Seven road maintenance and clearing measures are recommended:

1. Limit repairs to daylight hours.

Repairs would typically be limited to daylight hours. Please see Response to Comment A7-13, part f.

2. Minimize vehicle traffic outside of established dirt roads.

Mitigation Measure VEG-1c (Minimize native vegetation and habitat loss) would require final engineering of the project to minimize the extent of disturbance, including disturbance for new access roads. All work activities, vehicles, and equipment will be confined to approved roads and staked and flagged or marked work areas.

3. Outside of established roads, drive on sheets of plywood to avoid collapsing burrows.

All work activities, vehicles, and equipment will be confined to approved roads and staked and flagged or otherwise marked work areas which have undergone a biological clearance.

4. Use road grading techniques that create little or no berm.

The Proposed Project would require maintenance of existing access roads and construction of new access roads, which may result in the creation of berms or disturbance of existing berms. See Section B (Description of Proposed Project) of the EIR for additional details. Mitigation Measure WIL-2d (Conduct surveys and avoidance for Stephens' kangaroo rat) would require pre-construction surveys for SKR sign, including surveys of new and existing access roads, and focused trapping surveys if sign is present. If SKR are present, then additional measures would be implemented to prevent or minimize take, such as installation of exclusion fences or other measures, subject to authorization by USFWS and CDFW.

5. Do not borrow material for road repair within occupied SKR habitat.

Section B (Description of the Proposed Project) does not indicate that road repair will require any borrow material.

6. Do not import material that may contain weeds.

Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) would require preparation and implementation of an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP will specify guidelines for any soil, gravel, mulch, or fill material to be imported into the Proposed Project area, transported from site to site within the Proposed Project area, or transported from the Proposed Project area to an off-site location, to prevent the introduction or spread of weeds to or from the Proposed Project area.

7. Prior to road repairs, survey and trap for SKR.

Mitigation Measure WIL-2d (Conduct surveys and avoidance for Stephens' kangaroo rat) would require pre-construction surveys for SKR sign, and focused trapping surveys if sign is present. If SKR are present, then additional measures shall be implemented to prevent or minimize take, such as installation of exclusion fences or other measures, subject to authorization by USFWS and CDFW.

- A7-20 The commenter states that vernal pool habitat should be assessed for vernal pool fairy shrimp and spreading navarretia.

None of the seasonally ponded depressions found during the vernal pool assessment survey conducted between November 2011 and March 2013 met the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP) criteria for vernal pools. Focused fairy shrimp surveys were conducted in the seasonally ponded depressions during the 2011-2012 and 2012-2013 wet seasons and 2012 dry season. No special-status fairy shrimp were detected. Because the Project Study Area is outside of the known range of vernal pool fairy shrimp and none was observed during focused surveys, it is considered absent from the Project Study Area.

Spreading navarretia was not observed during special-status plant surveys of the Project Study Area in 2012 and 2013 and was not identified as having any potential for occurrence. There are no California Natural Diversity Database (CNDDDB) records for spreading navarretia in San Bernardino County. In Riverside County, all CNDDDB occurrences for spreading navarretia are over five miles from the project site. It is therefore considered absent from the Project Study Area.

- A7-21 The commenter states that project access roads can facilitate unauthorized uses such as trash dumping, target shooting, and off-highway vehicle (OHV) use and resulting impacts to special-status species and requests inclusion of a project Vehicle Access Management Plan (VAMP).

The Proposed Project would be constructed in an existing transmission line corridor. In areas where access control is appropriate and feasible, those controls already exist. If existing access controls (i.e., gate closure) are utilized during project implementation, any unauthorized public use associated with the Proposed Project would be similar to existing conditions and not a new impact requiring mitigation. To ensure that existing access

controls are utilized during project implementation, the text of Mitigation Measure VEG-1c (Minimize native vegetation and habitat loss) has been revised in the Final EIR to require that, as feasible and consistent with project safety and other applicable requirements, existing gates on project access roads will be closed and secured when project personnel enter or leave an area.

- A7-22      The commenter states that incidental take must be authorized under Section 7 or Section 10 of the federal Endangered Species Act and SCE may participate in the WR-MSHCP or Coachella Valley MSHCP.

The project route traverses land in two different Multiple Species Habitat Conservation Plans (MSHCPs). It also crosses Morongo Tribal land and portions of San Bernardino County that are not within an MSHCP area. In addition, it crosses BLM land within the Coachella Valley MSHCP (CV-MSHCP) area, but not covered by USFWS and CDFW take authorization for the CV-MSHCP. SCE intends to participate in both MSHCPs as a Participating Special Entity (PSE), but the PSE application process is not complete as of October 2015. Where mitigation is identified in the EIR, the analysis indicates whether each mitigation measure would be applicable within each jurisdictional area, based in part on whether MSHCP participation would mitigate the impact independently from mitigation measures identified herein.



Comment Set B1 – Southern California Gas Company



Anthony A. Klecha  
Team Lead, Planning & Project Support  
Southern California Gas Company  
555 W. 5th Street, 61172  
Los Angeles, CA 90013  
Tel: (213) 244-4339  
aklecha@semprautilities.com

August 27, 2015

Sent via Email

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

**Re: Draft Environmental Impact Report/Environmental Impact Statement for the Southern California Edison West of Devers Upgrade Project**

To Whom It May Concern:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the subject Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS). SoCalGas understands that the proposed project would replace or upgrade Southern California Edison's (SCE's) existing 220 kV transmission lines and structures between Devers, El Casco, San Bernardino, and Vista substations to increase the system transfer capacity from 1,600 megawatts to 4,800 megawatts. Other components of the project would include substation equipment upgrades, relocation of 2 miles of 66 kV subtransmission lines and 4 miles of 12 kV distribution lines, and installation of telecommunications lines and equipment for the protection, monitoring, and control of transmission lines and substation equipment. SoCalGas further understands that the proposed project would parallel, cross, or be adjacent to several SoCalGas pipelines. SoCalGas respectfully requests that the following comments be considered prior to certification of the Final EIR/EIS:

SoCalGas understands that SCE will contact Underground Service Alert (USA) at least two business days prior to performing any excavation work. SoCalGas further understands that SCE will perform engineering studies to determine whether and what cathodic protection would be required on pipelines potentially affected, and will share this information with SoCalGas, along with any applicable construction plans and protection measures or compensation to be implemented. SoCalGas concurs with these measures. Please contact Rosalyn Squires, Pipeline Planning Assistant, at (818) 701-4546 to coordinate the transfer of this information.

Once again, we appreciate the opportunity to comment on the proposed project. If you have any questions, please feel free to contact me at (213) 244-4339 or aklecha@semprautilities.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony A. Klecha", followed by a horizontal line.

Anthony A. Klecha  
Southern California Gas Company

cc: Rosalyn Squires (SoCalGas)

B1-1

## Responses to Comment Set B1 – Southern California Gas Company

- B1-1      The commenter states that it understands that the Proposed Project would parallel, cross, or be adjacent to several SoCalGas pipelines, and that SoCalGas concurs with the impact analysis and mitigation measures discussed in the Draft EIR/EIS to ensure the protection of existing utilities.

As noted on page D.17-28 of the Draft EIR/EIS, SCE is required to contact a regional notification center at least two days prior to excavation of any subsurface installation by Section 1, Chapter 3.1, "Protection of Underground Infrastructure," Article 2 of California Government Code §§4216-4216.9. In addition, in Section D.17 (Utilities and Public Services) of the EIS, Mitigation Measure UPS-2a (Protect pipelines and overhead and underground utilities) would require SCE to perform engineering studies to determine whether and what cathodic protection would be necessary to protect existing pipelines potentially affected. Evidence of coordination with all pipeline and utility owners with facilities in the vicinity of planned construction, including their review of SCE's construction plans and a description of any protective measures or compensation to be implemented to protect affected facilities, is also required as a part of Mitigation Measure UPS-2a. The commenter's concurrence with these measures is noted.

Comment Set B2 – Seven Oaks Medical Center

## Comment Form

West of Devers Upgrade Project  
Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:  
<http://www.cpuc.ca.gov/environment/info/ospen/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 8/27/15

Name\*: John Steinmann

Affiliation (if any)\*: Seven Oaks Medical Center, Advanced Ambulatory Surgery Center, Accredited Outpatient

Address\*: 1901 W Lugonia Ave

City, State, Zip Code\*: Redlands, CA 92374

Telephone Number\*: 909-557-2360

Email\*: jsteinmann@renaus-surgical.com

Comment\*: See below:

To whom it may concern,

We have developed a 50,000 sq ft Class A Medical Office building and Surgery Center on the corner of Nevada and Lugonia Ave in Redlands. The proposed project is anticipated to bring a 66kV line along the our eastern property line. Please accept our opposition to this occurrence for the following reasons:

1. We have a surgery center using digital and wireless monitoring within 80 ft of the proposed lines. We oppose any development that might place our patients at risk.
2. Overhead lines are unsightly and would diminish the value of our investment. We have spent a great deal of money to construct a first class medical office building and should not have the aesthetics of this building affected when an underground alternative must be available.

We all come to work and switch on the light and cool our space and are indebted to the work of SCE for providing this to us. We simply request that this project not put our patients at risk and respect the efforts we have made to construct a first class facility.

John Steinmann

Please send me notifications by: ☒ email ☐ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed.  
Please submit comments no later than September 22, 2015. You may also submit comments by email to [westofdevers@speneng.com](mailto:westofdevers@speneng.com) or by phone (888) 456-0254.

B2-1

B2-2

### Responses to Comment Set B2 – Seven Oaks Medical Center (John Steinmann)

**B2-1** The commenter is concerned that the Proposed Project could interfere with digital and wireless monitoring at the medical office building and surgery center ("Medical Facility") located on the southwest corner of intersection of Nevada Street and W. Lugonia Avenue in Redlands. The 66 kV subtransmission line proposed in this area would be located on poles a minimum of approximately 130 feet from the Medical Facility itself, separated by a parking lot that surrounds the Medical Facility building. Although SCE has not provided modeling of an estimated field level at a 130 foot distance, it is likely that the fields from the 66 kV line would be substantially diminished and would not create any issues for equipment within the facility.

However, in the event that the energized subtransmission line does create interference with radio, television, communications, or electronic equipment, Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and Resolve Electronic Interference Complaints) have been included in Section D.21 (Electrical Interference and Safety) of the EIS and would apply for the life of the project and reduce any such potential impact. Mitigation Measure EIS-1a requires use of the Institute of Electrical and Electronic Engineers Radio Noise Design Guide for limiting the conductor surface gradient. Mitigation Measure EIS-1b requires SCE to respond to, document, and resolve radio/television/electronic equipment interference complaints received. In sum, given the distance between the Medical Facility and the subtransmission line interference by the project with digital and wireless monitoring or the calibration of equipment at the Medical Facility is not expected, and should any interference issues arise Mitigation Measure EIS-1b requires SCE to respond, document and resolve interference complaints.

**B2-2** The commenter is concerned that the project will diminish the value of his investment because overhead lines are allegedly unsightly and an underground alternative must be available.

The commenter's Medical Facility is at the southwest corner of West Lugonia Avenue and Nevada Street in Redlands. Two poles would be installed along Nevada Street adjacent to the property to support a 66 kV subtransmission line. The poles would be over 130 feet from the building itself, separated by a parking lot that surrounds the building. Street trees and light standards are present along the street. The EIS addresses property values in Section D.8.3.3 (Socioeconomics and Environmental Justice, Impacts and Mitigation Measures). See in particular the discussion for Impact SE-5 (Construction of the project could adversely affect property values), where a review of pertinent literature on the subject is provided. The comment does not provide any information or evidence that would change the EIS conclusion that there are no definitive answers about whether and to what degree the presence of a transmission line may affect property value. Also, please see Response to Comment B3-3 and General Response GR-5 (Property Values) for additional information.

Section D.18 (Visual Resources) in the EIS discusses impacts to visual resources from the 66 kV subtransmission line. The majority of construction activities and equipment brought into the Proposed Project study area and onto the Proposed Project sites would be temporary in nature and would, therefore, not result in a substantial long-term visual impact. As mentioned above, street trees and light standards are present along the street which would serve to partially screen views of the new tubular steel poles and lightweight steel/wood poles. Given this and the commercial nature of the property, the Final EIS concludes that the

resulting visual change or contrast in the context of the existing landscape's visual would not be substantial.

Development of an underground alternative in this area is not necessary to avoid or substantially lessen effects of the Proposed Project. Therefore an underground alternative at this location has not been evaluated in the EIS, because it clearly would not meet the alternatives screening criteria described in EIS Appendix 5, Section 2 (Description of Alternatives Evaluation Process).

# Comment Set B3 – Arrowhead Orthopaedics



James D. Martin, MD, FACS  
Colleen D. Mitchell, MD, FACS  
John C. Sorenson, DO, FACS  
Barry C. Givens, MD, FACS  
Barry J. Givens, MD, FACS  
Gary K. Frykman, MD, FACS  
Richard A. Burns, MD, FACS  
Paul D. Burton, DO, FACS  
Curtis E. Hughes, II, MD, FACS  
John W. Shultz, MD, FACS  
Jonathan K. Lee, MD, FAAPMR  
Andrew S. Wang, MD, FACS  
Ray J. Caputo, MD, FACS  
Wade Farber, DO, FACS  
Eric C. Brown, DO, FACS  
Angela Hansen, MD, FACS  
Jay N. Shah, MD, FACS  
Jachary L. Haller, MD, FACS  
Peter C. Chang, MD, FACS  
Curtis R. Lofgren, MD, FACS  
Lawrence R. Wilson, MD, FACS  
David H. Dwyer, MD, FACS  
Alison Goodrich, MD, FACS  
Lung V. Lu, MD  
Michael O'Brien, DPM, FACFAS  
James R. Lofgren, DPM, FACFAS  
Scott R. Jones, MD, FAAPMR  
Jonathan Allen, MD  
Heidi Terpen Jaffe, PA-C  
Christine Thelander, PA-C  
Patricia Moore, PA-C  
Eve Wagner, PA-C  
Nabil Y. Razzouk, Ph.D., CEO

September 11, 2015

To whom it may concern,

Re: Proposed West of Devers Upgrade Project

We are appalled at the suggestion that SCE finds it necessary in the twenty first century to string another set of heavy voltage wires over a very busy corridor disrespecting established routes of travel and disrupting the operation of existing service organizations that could be negatively impacted.

Arrowhead Orthopaedics is a Multi-subspecialty group of Orthopaedics surgeons. We occupy around 50,000 sq. ft. of Class A Medical office building at the corner of Nevada and Lugonia, and operate a busy surgery center and a diagnostic imaging center in the same building.

Our opposition to the proposed project as presented stems from three major concerns:

1. First, is related to our growing dependence on digital and wireless networking within our premises. Stringing high voltage wires less than 80 feet from our facility will significantly impact the calibration of our equipment and diminish our capability to provide quality medical and surgical care to our patients.
2. Secondly, there is some established evidence of correlation between incidents of cancer among those working or living in proximity of such high-voltage wires. As a healthcare organization, we would not want to expose our patients and staff to such unnecessary danger. Where such projects exist, SCE seem to have acquired sufficient easements that seem to keep away residential or commercial activity and thus minimize the risk. In this incident we do not have the option of packing and leaving the impacted corridor.
3. Thirdly, we are concerned about the fact that such project will undoubtedly devalue our existing property and introduce an unsightly fixture to our environment.

We have known SCE to be an innovative organization and one that is considerate of the environment and the people who share space with the company's projects. Thus we urge SCE to use the same level of ingenuity and consideration in the design and implementation of this project by routing it to where there is less established human activity.

Thank you for your consideration.

Nabil Y. Razzouk, Ph.D.  
CEO

ARTHROSCOPIC • HAND • SPINE • FOOT & ANKLE • TRAUMA • SPORTS MEDICINE • JOINT REPLACEMENT • PEDIATRY • PAIN MANAGEMENT • WORK COMP

Administrative Office  
1900 W. Lugonia Ave., 2ND  
Redlands, CA 92374  
T: (909) 347-6660  
F: (909) 352-1100

1900 W. Lugonia Ave.  
120, 150, 200, 3RD  
Redlands, CA 92374  
T: (909) 347-6660  
F: (909) 349-8200

2174 E. Hill Drive, 3RD  
San Bernardino, CA 92404  
T: (909) 226-6600  
F: (909) 397-1793

4174 Riverside Plaza, 2ND  
Riverside, CA 92505  
T: (951) 517-2500  
F: (951) 504-2629

3800 West Orange Ave., 2ND  
Hemet, CA 92343  
T: (951) 922-1000  
F: (951) 922-2122

8800 Folsom Ave., 2ND  
Rancho Cucamonga, CA 91730  
T: (909) 922-1700  
F: (909) 989-4477

20000 Hospital Rd., 11A  
Lake Arrowhead, CA 91752  
T: (909) 336-3000  
F: (909) 336-4340

15000 Arroyo Rd., 10A  
Vero Beach, FL 32909  
T: (305) 247-4400  
F: (305) 415-9211

www.arrowheadortho.com

### Responses to Comment Set B3 – Arrowhead Orthopaedics

- B3-1 The commenter is concerned about alleged impacts on the calibration of equipment from the proposed 66 kV subtransmission line and a diminished capacity to provide quality care to patients at the Medical Facility. Please see Response to Comment B2-1.
- B3-2 The commenter is concerned about alleged incidents of cancer among those living or working in proximity to high-voltage wires. Please see General Response GR-6 for a discussion of Electric and Magnetic Fields (EMF), including health effects.
- B3-3 The commenter is concerned that the project will devalue his office building property at the Medical Facility and introduce an unsightly fixture into his environment.

The Medical Facility property is at the southwest corner of West Lugonia Avenue and Nevada Street in Redlands. Two poles would be installed along Nevada Street adjacent to the property to support a 66 kV subtransmission line. The poles would be over 130 feet from the building itself, separated by a parking lot that surrounds the building. Street trees and light standards currently exist along the road. The EIS addresses Proposed Project's effect on property values in Chapter D.8 Socioeconomics and Environmental Justice, in Section D.8.3.3 (Impacts and Mitigation Measures). In particular see the discussion for Impact SE-5, Construction of the project could adversely affect property values, where a review of pertinent literature on the subject is provided. The comment does not provide any information or evidence that would change the EIS conclusion that there are no definitive answers about whether and to what degree the presence of a transmission line may affect property values. No change in the document has occurred as a result of this comment.



Comment Set B4 – Palen Solar Holdings LLC

GOODIN,  
MACBRIDE,  
SQUERI & DAY, LLP

Michael B. Day, Attorney at Law

September 22, 2015

Billie C. Blanchard / Frank McMenimen  
CPUC / BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

Re: Comments of Palen Solar Holdings, LLC on the Draft Environmental  
Impact Report for the West of Devers Upgrade Project

Dear Ms. Blanchard and Mr. McMenimen:

In accordance with the August 7, 2015 Notice of Availability of the Draft Environmental Impact Report/Environmental Impact Statement (“DEIR/EIS”) on Southern California Edison Company’s (“SCE”) application to build and operate the West of Devers Upgrade Project (“WODUP”), Palen Solar Holdings, LLC (“Palen Solar”) submits its comments on the DEIR/EIS.

Palen Solar has a significant interest in the WODUP because Palen Solar anticipates interconnecting its 500 MW solar thermal project (“Palen Project”) with the Red Bluff Substation and, according to the Palen Project’s Large Generator Interconnection Agreement (“LGIA”), the WODUP must be completed in order for the Palen Project to achieve Full Capacity Deliverability Status. Under SCE’s proposal (“Proposed Project”), SCE will remove its existing 220 kV transmission lines and replace them with higher capacity lines, upgrade its substations, and remove and relocate some of its 66 kV subtransmission lines and 12 kV distribution lines in the Blythe and Desert Center areas. Currently, the transmission lines in the Blythe and Desert Center areas have a total power transfer capability of 1,600 MW. SCE proposes increasing its power transfer capability in these areas by 3,200 MW to achieve a total transfer capability of 4,800 MW.

The DEIR/EIS finds SCE’s Proposed Project to be the “least environmentally preferred” option.<sup>1</sup> Instead of supporting the Proposed Project, the DEIR/EIS proposes other environmentally-preferred alternatives. It declares the “Environmentally Superior Alternative” to be the Phased Build Alternative; the “Second Preferred Alternative” is a combination of the Tower Relocation Alternative, the Iowa Street 66 kV “Underground Alternative,” and SCE’s Proposed Project.

<sup>1</sup> DEIR/EIS, Executive Summary at ES-1.

**Comment Set B4 – Palen Solar Holdings LLC (cont.)**

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Palen Solar believes the Phased Build Alternative must be reevaluated to properly account for SCE's need for 4,800 MW of total transfer capability. Any other alternative should also recognize the 4,800 MW total transfer capability need as one of the project's primary objectives. Furthermore, the Phased Build Alternative must consider the environmental impact of any future phases that will allow for a 4,800 MW total transfer capability; failure to do so violates the California Environmental Quality Act's ("CEQA") prohibition against a piecemeal review of alternative options. Finally, Palen Solar requests confirmation that any alternatives will allow full deliverability for its 500 MW Palen Project and clarification of the length of delays any alternatives will cause.

Palen Solar urges correcting the deficiencies in the DEIR/EIS's analysis and selecting SCE's need for 4,800 MW of total transfer capability. If the final Environmental Impact Report/Environmental Impact Statement ("EIR/EIS") finds the Proposed Project as not environmentally superior, the California Public Utilities Commission ("CPUC") / Bureau of Land Management ("BLM") should adopt a Statement of Overriding Consideration showing that the benefits of the Proposed Project justify its approval. While the Proposed Project will, like any construction project, have some environmental concerns, the benefit the Proposed Project will produce outweighs its impacts. Alternatively, the Second Preferred Alternative should be selected as the Environmentally Superior Alternative. The final result should find the Phased Build Alternative as not viable for the reasons expressed below.

**COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT**

The DEIR/EIS is fundamentally flawed and based on inadequate analysis of project alternatives in place of SCE's WODUP. The DEIR/EIS fails to account for SCE's objective to increase total transfer capability in the transmission corridor to be 4,800 MW and improperly analyzes project alternatives in piecemeal fashion. The final EIR/EIS, instead, should find SCE's Proposed Project to be environmentally superior. If the final EIR/EIS identifies another alternative as the Environmentally Superior Alternative, it must take into account SCE's need for 4,800 MW total transfer capability and not conduct a piecemeal environmental review.

**Fundamental Flaws in the DEIR/EIS**

**1. The DEIR/EIS Fails to Properly Incorporate SCE's Primary Objective to Obtain 4,800 MW of Total Transfer Capability**

Both the Phased Build Alternative and the Second Preferred Alternative fail to meet one of SCE's primary objectives: to increase total transfer capability in the corridor to 4,800 MW. The Phased Build Alternative and Second Preferred Alternative identify three project objectives: (1) to increase system deliverability; (2) to support goals for renewable energy; and (3) to maximize any remaining space within the corridor.<sup>2</sup> These objectives are derived from an

<sup>2</sup> *Id.*, Section C at C-19 to C-20, C-26.

B4-1  
cont.

Comment Set B4 – Palen Solar Holdings LLC (cont.)

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earlier discussion in Section A that identifies six project objectives for SCE.<sup>3</sup> The three CPUC / BLM project objectives are distilled from what the DEIR/EIS identifies as SCE's six objectives.<sup>4</sup> While the DEIR/EIS's objectives recognize a need to increase system deliverability, none of the objectives acknowledge SCE's *specifically stated need* for a total transfer capability of 4,800 MW.

The Phased Build Alternative's First Objective Does Not Meet the Capacity Requirements for Full Transfer Capability

The DEIR/EIS identifies the first objective of the Proposed Project as allowing SCE "to meet its obligations to integrate and fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid."<sup>5</sup> This ostensibly requires a project build-out to the 4,800 MW that SCE requires for full transfer capability. When describing the first Basic Project Objective under the Phased Build Alternative, however, the DEIR/EIS states that it "would allow SCE to fully deliver about 3,000 MW of the output from new generation projects . . . ." This is 1,800 MW less than the capacity SCE believes is required to ensure full deliverability for numerous generation projects in the Blythe and Desert Center areas. Though the DEIR/EIS states its 3,000 MW figure satisfies the California Independent System Operator's ("CAISO") 2024 Reliability Base Case, which includes specific generation projects the CAISO believes are most likely to be constructed,<sup>7</sup> this analysis fails to include additional projects in the CAISO queue that are included in the CAISO planning processes.<sup>8</sup> The DEIR/EIS further states this alternative is "technically feasible."<sup>9</sup> Technical feasibility, however, does not justify a shortfall of 1,800 MW.

This substantial shortfall is particularly surprising in light of the fact that the WODUP has always been planned as a 4,800 MW project, and has been included in the CAISO's Transmission Planning Process ("TPP") since 2010 at the 4,800 MW capacity. The final EIR/EIS should take into account SCE's need for 4,800 MW of total transfer capability, which SCE has repeated continuously throughout this proceeding. SCE's application for the Proposed Project, pending in front of the CPUC, states that achieving "full deliverability" of new generation projects in the area is a primary need.<sup>10</sup> The application is clear that to meet this need requires SCE to increase the transfer capability by 3,200 MW, which would result in a total

<sup>3</sup> *Id.*, Section A at A-5.

<sup>4</sup> *Id.*, Section A at A-11 to A-13.

<sup>5</sup> *Id.*, Section A at A-5.

<sup>6</sup> *Id.*, Section C at C-26. This objective is categorized as "Increase system deliverability."

<sup>7</sup> *Ibid.*

<sup>8</sup> See *id.*, Section A at A-9 to A-10, Table A-4. The Phased Build Alternative would only allow an increase in deliverability by 1,400 MW, yet the DEIR/EIS's Table 4 recognizes that there is a total of 4,961 MW of planned or on-hold generation projects seeking to rely on the WODUP. See *ibid.*; see also *id.*, Section C at C-26.

<sup>9</sup> DEIR/EIS, Section C at C-26.

<sup>10</sup> Application (A.)13-10-020 at 2 (emphasis added).

B4-1  
cont.

Comment Set B4 – Palen Solar Holdings LLC (cont.)

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transfer capability of 4,800 MW.<sup>11</sup> SCE's Proponent's Environmental Assessment also states a need for a total transfer capability of 4,800 MW.<sup>12</sup> Additionally, when the CPUC sent a data request to SCE to better understand SCE's objectives, SCE replied that a primary need was to have a total transfer capability of 4,800 MW.<sup>13</sup>

B4-1  
cont.

The DEIR/EIS's CPUC / BLM Objectives Must be Revised to Reflect SCE's 4,800 MW Transfer Capability Need

The Phased Build Alternative's conclusion that a total transfer capability of only 3,000 MW and not 4,800 MW will meet the objectives of the WODUP is unfounded. SCE has stated numerous times that it needs to construct a project with a total transfer capability of 4,800 MW. The DEIR/EIS even identifies the purpose of the WODUP as increasing total transfer capabilities to 4,800 MW.<sup>14</sup> It then goes on to state that "[i]ncreasing the system transfer capacity in the corridor is SCE's proposed solution to achieving its Project Objectives, and to integrate growth in generation."<sup>15</sup>

Accordingly, the CPUC and BLM should be well aware that an alternative calling for anything less than 4,800 MW would be a serious concern for SCE. It is also a serious concern for renewable generation owners such as Palen Solar that are relying on the WODUP for interconnection and full deliverability status. The DEIR/EIS's failure to include the required 4,800 MW of total transfer capacity in the project objectives must be remedied.

The Total Transfer Capability in the Tower Relocation Alternative and Underground Alternative Must be Clarified to Include a Total Transfer Capability of 4,800 MW

B4-2

The DEIR/EIS is unclear as to whether the Second Preferred Alternative would provide a total transfer capability of 4,800 MW. While the Tower Relocation Alternative would provide "the same transfer capability and deliverability as the Proposed Project,"<sup>16</sup> the same is not apparent for the Underground Alternative. The final EIR/EIS must clarify that the Underground Alternative will allow a total transfer capability of 4,800 MW. If the Underground Alternative cannot allow for a total transfer capability of 4,800 MW, it cannot be considered a viable project alternative in the final EIR/EIS.

<sup>11</sup> *Ibid.*

<sup>12</sup> Southern California Edison's West of Devers Upgrade Project, *Proponent's Environmental Assessment*, Section 1.0 "Purpose and Need" at 1-16.

<sup>13</sup> *Response to SCE Data Request #8*, Data Response PD-24 A (Oct. 14, 2014).

<sup>14</sup> DEIR/EIS, Section A at A-5, *Review of SCE's Purpose and Need*.

<sup>15</sup> *Ibid.*

<sup>16</sup> *Id.*, Section C at C-19.

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Basic Project Objective 1 for both the Tower Relocation Alternative and the Underground Alternative must also be revised to explicitly declare a need for 4,800 MW of total transfer capability. Even if the final EIR/EIS concludes these alternatives would allow for a total transfer capability of 4,800 MW, not altering Basic Project Objective 1 to reflect this objective would be unsatisfactory. The final EIR/EIS for both of these alternatives should assure (1) a primary objective of 4,800 MW total transfer capability and (2) that the actual alternatives will allow for a total transfer capability of 4,800 MW.

B4-2  
cont.

**2. The Phased Build Alternative Includes an Improper Piecemeal Review Prohibited by CEQA**

B4-3

Under CEQA, the lead agency must conduct an EIR/EIS when construction of a proposed project will have a significant environmental effect.<sup>17</sup> The EIR/EIS cannot break up a project and analyze certain aspects while excluding analysis of other aspects in order to find the proposed alternatives will have a less significant environmental impact. Such piecemeal review is prohibited under CEQA. The California Supreme Court has established a two-part test to ensure an EIR/EIS does not undergo a piecemeal review:

[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project, and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.<sup>18</sup>

The DEIR/EIS states that the Phased Build Alternative will “[a]llow for future capacity expansions of the existing corridor with several options for future phases.”<sup>19</sup> The DEIR/EIS, however, does not analyze the environmental impact of these future phases. Under the *Laurel Heights* two-part test, the final EIR/EIS must consider these future phases.

First, it is reasonably foreseeable that the WODUP will need additional transfer capability above 3,000 MW to account for other generation projects not considered in the Phased Build Alternative. Many of these generation projects not considered have either entered into LGIAs with SCE, have begun negotiations for LGIAs, or anticipate interconnecting with the WODUP.<sup>20</sup> The DEIR/EIS therefore acknowledges it is reasonably foreseeable that additional transfer capacity above 3,000 MW will be needed in the future. Furthermore, the Legislature’s recent passage of SB 350, which requires a Renewable Portfolio Standard of 50 percent by 2030,

<sup>17</sup> Cal. Pub. Resources Code § 21100.

<sup>18</sup> *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.*, 47 Cal. 3d 376, 396 (1988).

<sup>19</sup> DEIR/EIS, Section C at C-25 (emphasis added).

<sup>20</sup> *Id.*, Section A at A-8; see also *id.* at A-9 to A-10, Table A-4.

**Comment Set B4 – Palen Solar Holdings LLC (cont.)**

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makes it even more likely that future renewable generation facilities will need to interconnect to transmission lines such as the WODUP.<sup>21</sup>

B4-3  
cont.

Second, any future expansion occurring through future phases will have environmental impacts. If SCE is required to undertake a second phase under the Phased Build Alternative to increase total transfer capability, SCE will have to re-mobilize construction crews. After re-mobilization, additional rounds of construction will occur. The Phased Build Alternative is only an interim solution to mitigate short-term environmental consequences. In the long run the Phased Build Alternative delays an inevitable increase in transfer capacity, which would then require additional environmental disturbance. The Phased Build Alternative would be more environmentally destructive than the Proposed Project, as it would require construction crews to mobilize and undertake construction more than once. As a result of the additional impacts caused by phasing the work that will be required for full buildout, Palen Solar contends that the superior environmental option is SCE's Proposed Project, which only requires mobilization, construction, and expansion of the WODUP in one single construction project. Because the DEIR/EIS clearly anticipates future phases in the Phased Build Alternative, CEQA mandates that the final EIR/EIS must analyze the "environmental effects of future expansion . . . ."<sup>22</sup>

**3. Developers with CAISO Queue Positions or LGIAs Need Assurance They Will Receive Timely, Full Capacity Deliverability Status**

B4-4

The DEIR/EIS is unclear whether developers with CAISO queue positions or developers with executed LGIAs will receive full capacity deliverability status. It is also unclear whether developers will receive full capacity deliverability status in the timeframe proposed in SCE's CPUC application or whether the alternatives proposed in the DEIR/EIS will cause substantial delay. In keeping with the State policy to support renewable development, the CPUC / BLM should work with the California Energy Commission and CAISO to coordinate transmission planning and to inform project developers of changes in project schedules.<sup>23</sup> Working together will ensure that developers are not blindsided by changes to transmission projects that may negatively affect the deliverability of their particular renewable project. The WODUP was always designed as a 4,800 MW project; the Phased Build Alternative causes great disruption and surprise by proposing a project that reduces that capacity. The CPUC's final decision on the application cannot adopt the DEIR/EIS's recommendation without ensuring that it does not have a negative effect on existing planned projects, like the Palen Project. As of now, the CAISO cannot give Palen Solar assurance that the Phased Build Alternative will not

<sup>21</sup> Sen. Bill No. 350 (2015-2016 Reg. Sess.) § 2. While the governor has yet to act on SB 350, by the time the final EIR/EIS is released the final results of the legislation will be available. The final EIR/EIS should take the legislation into account.

<sup>22</sup> See DEIR/EIS, Section C at C-25; *Laurel Heights*, 47 Cal. 3d at 396.

<sup>23</sup> See *Alignment of Key Infrastructure Planning Processes* by CPUC, CEC and CAISO Staff, available at <http://www.cpuc.ca.gov/NR/rdonlyres/367DF06D-05A4-4819-A632-1AF64368A0D4/0/ProcessAlignmentText.pdf> (Dec. 23, 2014).

**Comment Set B4 – Palen Solar Holdings LLC (cont.)**

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negatively affect the Palen Project. Palen Solar requests the final EIR/EIS to include assurance that any viable alternatives in the final EIR/EIS will allow the Palen Project to have timely, full 500 MW deliverability into the WODUP.

B4-4  
cont.

**4. The DEIR/EIS's Alternatives Fail to Account for any Necessary Capacity for WODUP Upgrades and Fail to Use Policy-Driven Scenarios**

B4-5

The DEIR/EIS Phased Build Alternative does not consider many presently known projects that will require transmission access that will affect deliverability in the region if the total transfer capability is less than 4,800 MW. For instance, the CPUC / BLM should be aware of the 985 MW interim West of Devers project that the DEIR/EIS does not include as necessary capacity for the WODUP.<sup>24</sup> Furthermore, while the DEIR/EIS relies on the CAISO 2024 Reliability Base Case, it does not use any policy-driven scenarios.<sup>25</sup> For example, in a recent data request from the Office of Ratepayer Advocates, it asks how the DEIR/EIS determined a level of need for the WODUP. The response states the DEIR/EIS “does not determine or define any level of need for the proposed [WODUP].”<sup>26</sup> Palen Solar has not had the time to conduct a full scale analysis of any errors the DEIR/EIS made when evaluating deliverability inputs. Palen Solar urges the CPUC / BLM to closely examine whether there are omissions or incorrect assumptions regarding deliverability in the DEIR/EIS.

**5. The Final EIR/EIS Should Consider State Policies Calling for Development of New Renewable Generation Projects**

B4-6

The final EIR/EIS should align with State policy and consider new renewable generation projects likely to come online. As mentioned above, the Legislature recently passed SB 350 that requires a 50 percent RPS by 2030.<sup>27</sup> Passage of the bill reflects the State's policy goals to increase the number of new renewable generation projects in the future. The State, however, cannot achieve this policy if projects such as the WODUP do not allow full deliverability for renewable generation. Many renewable generation projects, especially solar generation, are located along the I-10 corridor and further east. The WODUP is designed to deliver generation from these projects into the electrical grid. Considering the State policy to increase renewable generation makes the Phased Build Alternative an unviable option. The 3,000 MW transfer capability is too small to allow deliverability of future generation in the area.

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<sup>24</sup> See A.13-10-020, *Southern California Edison Company's Direct Testimony on Need*, 399.2.5, *Maximum Cost, Field Management Plan, and Amended Direct Testimony on the Proposed Transaction for the West of Devers Upgrade Project* at 5, available at [http://www3.sce.com/sccc/law/dis/dbattach5e-nsf0/EABFC727A8A1F4E1C88257E2A0082BFFC/\\$FILE/A1310020%20WODUP%20-%20SCE%20Direct%20Testimony.pdf](http://www3.sce.com/sccc/law/dis/dbattach5e-nsf0/EABFC727A8A1F4E1C88257E2A0082BFFC/$FILE/A1310020%20WODUP%20-%20SCE%20Direct%20Testimony.pdf) (April 17, 2015).

<sup>25</sup> DEIR/EIS, Section C at C-25 to C-26.

<sup>26</sup> *Response to Office of Ratepayer Advocates Data Request #1* (Sept. 15, 2015).

<sup>27</sup> See *supra* at fn. 22.



Comment Set B4 – Palen Solar Holdings LLC (cont.)

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The DEIR/EIS's failure to allow for 4,800 MW of total transfer capability under the first objective also conflicts with the second CPUC / BLM objective of supporting renewable generation goals.<sup>28</sup> The best way to account for increasing renewable generation is to maximize deliverability of the WODUP. Therefore, the final EIR/EIS must include SCE's need for 4,800 MW of total transfer capability and should exclude any alternatives not meeting this criteria as unviable.

B4-6  
cont.

6. Other Issues the Final EIR/EIS Should Address

B4-7

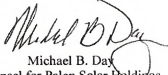
Palen Solar also requests the final EIR/EIS address two additional matters:

- a. The DEIR/EIS states the Palen Project "may propose a 250 MW power tower."<sup>29</sup> This information is incorrect. Palen Solar requests the final EIR/EIS include an updated finding that the California Energy Commission has approved a construction extension of the Palen Project. Such approval contemplates a 500 MW project, which, in turn, will require a full 500 MW of deliverability when the project is complete.<sup>30</sup>
- b. Clarification that is more specific and includes estimated dates regarding how much each alternative could delay completion of the WODUP.

B4-8

Very truly yours,

GOODIN, MACBRIDE,  
SQUERI & DAY, LLP

  
Michael B. Day  
Counsel for Palen Solar Holdings,  
LLC

cc: Service List, A.13-10-020

3496/002/X/175389.v1

<sup>28</sup> See DEIR/EIS, Section C at C-26.

<sup>29</sup> *Id.*, Section A at A-9, Table A-4.

<sup>30</sup> See California Energy Commission - Tracking Progress, "Renewable Energy Facility Siting in California" at 17, available at [http://www.energy.ca.gov/renewables/tracking\\_progress/documents/renewable.pdf](http://www.energy.ca.gov/renewables/tracking_progress/documents/renewable.pdf) (Sept. 3, 2015); see also California Energy Commission, *Order Granting Extension of Time to Construct*, Docket No. 09-AFC-7C (Sept. 16, 2015).

## Responses to Comment Set B4 – Palen Solar Holdings LLC

**B4-1** This comment asserts that the agency-defined project objectives must be revised to reflect SCE’s proposed transfer capability of 4,800 MW. The comment introduces other individual concerns that are addressed in the following individual responses, primarily by suggesting that the Phased Build Alternative should be evaluated in light of a presumed need for 4,800 MW of total transfer capability. Achieving deliverability specifically for the 500 MW Palen project is addressed in Response to Comment B4-4, and the potential for delays is addressed in Response to Comment B4-8.

The comment claims the EIS requires analysis of the impacts of “future phases” of construction that could occur under the Phased Build Alternative. [In its EIR, the CPUC also responds to this comment with regard to CEQA.] This topic is addressed in Response to Comment F1-13 [SCE’s cover letter], and additional and updated information on the topic of upgrading the corridor after the implementation of the Phased Build Alternative appears in General Response GR-4.

The comment reflects the opinion that any alternative satisfying Basic Project Objective 1 would not satisfy the level of presumed need. See General Response GR-1 on the level of project need. The EIS does not define a specific level of need for the Proposed Project (in megawatts of transfer capacity). General Response GR-2 notes that the objectives listed by SCE in its PEA for the Proposed Project included no minimum generation level goals.

Please refer to GR-2 for more information on the rationale for the CPUC and BLM Basic Project Objectives used in the process of developing a reasonable range of alternatives for the environmental review process.

**B4-2** The comment asserts that the Draft EIR/EIS is unclear in its discussion of the total transfer capability of the Tower Relocation and Iowa Street 66 kV Underground Alternatives. These alternatives are described in Section 4.2 and Section 4.3, respectively, of EIS Appendix 5 (Alternatives Screening Report) where the discussion clearly states they would provide the same transfer capability and deliverability as the Proposed Project.

The comment requests revision of Basic Project Objective 1 “to explicitly declare a need for 4,800 MW of total transfer capability.” This request reflects the opinion that alternatives to the Proposed Project cannot be considered as viable project alternatives unless that level of need is achieved. As noted in General Response GR-1, and in Response to Comment B4-1, it is not appropriate for the EIS to attempt to define the overall level of need or to speculate on the level of development that must be accommodated. Additionally, see General Response GR-2 on the topic of ensuring that the scope of alternatives is not unduly limited.

**B4-3** The commenter believes the Phased Build Alternative includes an improper piecemeal review that is prohibited by CEQA. Please see Response to Comment F1-13.

**B4-4** The comment asserts that the EIS should provide assurances for developers of generation projects seeking Full Capacity Deliverability Status (FCDS). A wide range of generation and transmission projects that contribute to the need for the Proposed Project appear in the EIS (Table A-4, Projects Contributing to Need for WOD Upgrade Project). Additionally, the EIS, in Section B.7.1, Definition of Connected Action Projects, recognizes that the 500 MW Palen project is closely related to the Proposed Project, and it is considered to be a “connected

action” under NEPA. The Palen project is shown in EIS Table A-6 (Project Analysis Determinations) and Table B-22 (Connected Actions – Solar Generation Projects).

As noted in General Response GR-1, it is not appropriate for the EIS to attempt to define the overall level of need or to speculate on the level of development that must be accommodated. Similarly, it is not appropriate for the EIS to assure that the Proposed Project or an alternative would guarantee the full deliverability status for any single individual project.

Consideration of Basic Project Objective 1 in EIS Appendix 5 (Alternatives Screening Report) includes Table Ap.5-3 (Projects Accommodated by the Phased Build Alternative), which shows projects likely to be made deliverable by the Phased Build Alternative, and the Palen project is shown as likely to be accommodated. Conducting a formal study of deliverability is beyond the scope of the EIS. While the EIS does not include a determination of deliverability, the EIS clearly assumes that the Palen project would be more likely to be developed successfully if the Proposed Project or an alternative is built. See General Response GR-3 for a discussion of the CAISO Transmission Planning Process and how renewable energy would be accommodated by the Phased Build Alternative.

B4-5 The comment asserts that the Phased Build Alternative does not consider many presently known generation projects. Response to Comment B4-4 describes the various components of the EIS discussing the full range of generation and transmission projects contributing to the need for the Proposed Project. These projects range from “connected actions” to cumulative projects (Section E) and projects that could fill a remaining growth-inducing capacity (Section A.3, Definition of Connected Actions and Related Projects). The EIS considers that the 2013 West of Devers Interim Project presently provides deliverability to 985 MW of installed renewable generation in the baseline conditions (EIS Section B.1.1), and this facility is not part of the power flow modeling of the alternative. This topic is also addressed in Response to Comment B9-5 (CAISO comment). See General Response GR-3 on the use of renewable energy resource portfolios from the transmission planning process as it relates to project-level environmental review.

B4-6 The comment requests consideration of California’s evolving policies to increase the renewable energy supply. The comment states that California’s renewable energy goals cannot be achieved without transmission facilities that allow “full deliverability,” and repeats the opinion that the Phased Build Alternative is “unviable” because it would have a lower capacity than the Proposed Project.

Response to Comment B4-1 addresses the concern that the capacity of the Phased Build Alternative would not be the same as SCE’s proposed transfer capability. See also General Response GR-1 regarding the topic of the feasibility of the alternative and the scope of the CPUC evidentiary hearing, and General Response GR-3 for a discussion of achieving California’s future renewable energy goals in light of Senate Bill 350 (2015).

B4-7 The comment requests the status of the Palen Project be updated based on approvals of the project by the Energy Commission. The comment also notes that the updated project would be for 500 MW.

In Section A.2.2 (Introduction, BLM’s Purpose and Need), Table A-4 (Projects Contributing to Need for WOD Upgrade Project) has been updated to reflect the Energy Commission’s extension of time to construct the Palen Project. The project is identified as a 500 MW project in Table A-4 so no change in project size is necessary. Section B.7 (Description of the Proposed

Project, Connected Action), including Table B-22 (Connected Actions – Solar Generation Projects) and Section B.7.2.1 (Connected Actions, Known Projects) and the analysis of the Connected Actions throughout Section D have been updated to reflect the revised status of the Palen Solar Project.

B4-8 The commenter requests clarification that is more specific and includes estimated dates regarding how much each alternative could delay completion of the project.

As stated in EIS Section B.3.10 (Description of the Project, Construction Schedule and Sequence), SCE anticipates that construction of the Proposed Project would take approximately 36-48 months following receipt of CPUC and BLM approvals, completion of final engineering and procurement activities, acquisition of any necessary property rights, and receipt of other applicable permits.

Compared to the Proposed Project, “Construction Timeframe” is discussed under “Feasibility” for each alternative in Appendix 5 (Alternatives Screening Report) of the EIS. See Response to Comment F1-20 for a discussion of the construction schedule for the Phased Build Alternative in particular. This comment implies that selection of the Phased Build Alternative would delay the in-service date. With the configuration described in the EIS, SCE’s November 2015 response to Data Request 17 (ALT-29) indicates that the Phased Build Alternative would have a similar construction timeline as the Proposed Project.

**Comment Set B5 – Natural Resources Defense Council**



September 22, 2015

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104  
E-mail: [westofdevers@aspenev.com](mailto:westofdevers@aspenev.com)

**RE: Comments of NRDC on West of Devers Draft EIS**

**Introduction**

I am writing on behalf of the Natural Resources Defense Council (NRDC) to recommend modifying the preferred recommendation on the Draft Environmental Impact Statement to preserve lower cost and less environmentally impactful development in the West of Devers corridor to meet present and expected future renewable energy development. The preferred alternative reduces the value of this upgrade by limiting ability to expand the lines in the future within a precious, already existing corridor that has the capacity to do so. These limitations will increase costs, slow the pace of renewable deployment, and potentially precipitate the need to find additional rights of way in a sorely congested part of the state.

NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing. NRDC has a long history of efforts to protect and conserve the nation's air, water, lands and wildlife resources. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America's energy needs both at the national level and in various states, including California.

**Future needs and state policy goals not fully considered by the DEIS**

NRDC supports the plan to expand this transmission because it is a crucial to our ability to meet present and future renewable energy and greenhouse gas (GhG) reduction goals. The selected route makes efficient use of existing corridors and has the fewest environmental impacts. It is supported by the Morongo Tribe, whose partnership with Southern California Edison is a landmark in utility-tribal transmission coordination. The proposed project would facilitate development of large scale solar in the Blythe and Desert Center areas, and was identified as an important transmission upgrade in the Renewable Energy Transmission Initiative (RETI), on which NRDC served.

NATURAL RESOURCES DEFENSE COUNCIL

111 SUTTER STREET | SAN FRANCISCO, CA 94104 T 415.875.6100 F 415.875.6181 NRDC.ORG

B5-1

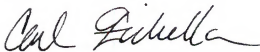
**Comment Set B5 – Natural Resources Defense Council (cont.)**

Yet the Draft EIR's preferred alternative would reduce the proposed increase in transfer capacity a third. The full increase is needed to accommodate renewable generation currently under development and future development necessary to achieve both the existing 33% RPS mandate and the new 50% RPS mandate that was approved after the Draft EIR was published, as well as continued GHG emissions targets mandated by AB32 (80% reduction from 1990 levels by 2050). Meeting all these goals will require a carefully planned and robust transmission system serving all parts of our state. Areas with the fewest options for transmission expansion (such as the West of Devers area), would benefit the most from a master planned, long-range approach to transmission development. Failing to allow for these acknowledged and known state policy goals seriously undermines the value proposition of the proposed project and hampers critical state environmental programs.

NRDC has long been a proponent of master planning both procurement and transmission to meet present and future needs.<sup>1</sup> This approach is being considered by the California Energy Commission, CAISO and the CPUC as part of the RETI 2.0 process and the San Joaquin Valley renewable energy zone development process.

By mandating a second round of construction and outages close on the heels of the first round of construction and outages the phased alternative will increase consumer costs and is highly likely to unnecessarily delay renewable energy development needed to meet the state goals mentioned above. The draft EIR itself concedes that the environmental impacts from successive rounds of constructions is a disadvantage of the Phased Alternative. Phased development is often the preferred approach to meeting future needs when they are not clear but reasonably anticipated. In this case we believe the goals are explicit and clear, the needs evident and delaying the development of capacity we know we will need is unnecessary.

Sincerely,



Carl Zichella  
Director of Western Transmission

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<sup>1</sup> See COMMENTS OF THE NATURAL RESOURCES DEFENSE COUNCIL ON REALIGNING TRANSMISSION PLANNING TO MEET STATE CLIMATE MITIGATION AND RENEWABLE ENERGY GOALS, Order Instituting Rulemaking to Continue Implementation and Administration of the California Renewables Portfolio Standard Program, Rulemaking 11-05-005, November, 2014

B5-1  
cont.

## Responses to Comment Set B5 – Natural Resources Defense Council

B5-1 The comment recommends modifying the conclusion for the environmentally superior alternative and states that the alternative would limit the ability to expand the corridor in the future, potentially leading to a need to find additional rights of way. The EIS assesses the goal of maintaining adequate space within the corridor in the consideration of Basic Project Objective 3, and Section 4.4 of Appendix 5 (Alternatives Screening Report) notes that the Phased Build Alternative would meet this objective by removing the existing single-circuit towers to create space for future transmission lines.

The comment also suggests that the Phased Build Alternative would mandate a “second round” of construction and outages following the potential construction of the Phased Build Alternative. The comment is based on the presumption that future expanded transmission capacity would be needed within the corridor. The EIS notes the potential for future expansion within the corridor, to the extent that it may be found needed, in Section 4.4 of Appendix 5 (Alternatives Screening Report).

See General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) for information on the level of potential “future” construction considered to be necessary or foreseeable at this time. General Response GR-1 notes that the overall level of project need will be addressed within the general proceeding.

More information regarding the need for additional environmental review of the Phased Build Alternative is discussed in Responses to Comments F1-12 and F1-13. See Response to Comment F1-11 in response to concerns regarding outages during construction of the Phased Build Alternative.

**Comment Set B6 – Seven Oaks Medical Center (Tim Delinger)**

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Tim Delinger <Tim.Delinger@Arrowheadortho.com>  
**Sent:** Tuesday, September 22, 2015 12:13 PM  
**To:** West Of Devers Project  
**Subject:** Comment on West of Devers Project

Good afternoon,

I am writing on behalf of the Seven Oaks Medical Center which owns a 50,000 square foot Class A medical office building at 1901 W. Lugonia Avenue in Redlands. I recently attended an informational workshop on the SCE West of Devers Upgrade Project and am very concerned about the 66kV overhead lines that are proposed to be constructed along Nevada Avenue adjacent to the Seven Oaks Medical Center property. Due to the size of these overhead lines, I am very concerned about the potential impact of the lines on the property and surrounding environment, the tenants in the building, and particularly the patients and employees who visit and work in the building. Some of the tenants in the building include a surgery center that uses digital and wireless monitoring, a diagnostic imaging center, a mobile phone provider with antennas on the roof, and a large orthopaedic healthcare practice.

My understanding based on the informational workshop is that one of the proposed alternatives, the Phased Build Alternative, would revise the project so that lighter weight and higher capacity conductors would be installed on existing towers which would allow the re-use of most existing towers with minimal structural changes. This would eliminate major construction in many new areas in the community and would reduce the impact on current businesses, homeowners, and the local environment. Therefore, I would like to request that full consideration be given to this alternative so that the negative impacts from this project will be reduced. Obviously electrical needs are essential and upgrades are sometimes unavoidable, but since there is a viable alternative that can reduce the consequences of the upgrade on the community, it is apparent to me that this alternative should be thoroughly considered and subsequently implemented if it is not already the first choice.

I would like to stay informed on this project so please send me future notifications by email.

Thank you for your consideration,

Tim Delinger, MBA  
1901 W. Lugonia Ave #230  
Redlands, CA 92374  
909-557-1603  
[tim.delinger@arrowheadortho.com](mailto:tim.delinger@arrowheadortho.com)

B6-1



**Responses to Comment Set B6 – Seven Oaks Medical Center (Tim Delinger)**

B6-1        The commenter writes regarding the same facility described in Comments B2 and B3 and expresses similar concerns. The commenter supports the Phase Build Alternative and requests to receive future notifications by email.

The commenter's support for the Phased Build Alternative is noted. Please refer to Responses to Comments B2-1, B3-1 and B3-2 regarding similar concerns about the Medical Facility building/property. The commenter is confirmed as being on the contact list for email notices.

Comment Set B7 – Independent Energy Producers Association

INDEPENDENT  
ENERGY  
PRODUCERS  
ASSOCIATION

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September 22, 2015

VIA E-MAIL WESTOFDEVERS@ASPENEG.COM

Billie Blanchard and Frank McMenimen  
CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94014

**Re: Comments of the Independent Energy Producers Association on Draft  
EIR/EIS for the West of Devers Transmission Upgrade Project**

Dear Ms. Blanchard and Mr. McMenimen:

The Independent Energy Producers Association (IEP) has reviewed the Draft EIR/EIS for the proposed West of Devers Upgrade project and offers these comments on the Draft.

IEP has determined that the Draft's identification of the environmentally preferred alternative to the project as proposed may be short-sighted. As the Draft recognizes, renewable energy makes a significant contribution toward meeting California's greenhouse gas emissions reduction goals. As part of the State's effort to reduce greenhouse gas emissions, the Legislature has recently passed Senate Bill 350, which increases the Renewables Portfolio Standard to 50% of retail electricity sales by 2030, and the Governor is expected to sign the bill into law. Meeting the new RPS goals present a considerable challenge, and greater access to renewable energy will be necessary if the State is to meet these new goals.

The Proposed West of Devers Upgrade is ideally situated to connect high-quality sites for wind, solar, and geothermal resources with the Los Angeles load center. The proposed project has the capability to transfer roughly 1000 megawatts of renewable energy more than the environmentally preferred alternative. Over the life of the Upgrade project, the environmental and other benefits of this potential increase in the supply of renewable energy to meet Southern California's demand for electricity will far outweigh the initially greater environmental impacts related to construction of the Proposed Project.

The Final EIR/EIS should recognize the added environmental benefits that will result if an additional 1000 MW is available to transfer renewable energy from the desert areas and Southwestern states to meet California's higher RPS goals. IEP respectfully urges the Commission to consider these additional benefits and to approve the Proposed Project as the route for the West of Devers Upgrade.

B7-1

**Comment Set B7 – Independent Energy Producers Association (cont.)**

Very truly yours,



Jan Smutny-Jones, Chief Executive Officer  
Independent Energy Producers Association

## Responses to Comment Set B7 – Independent Energy Producers Association

B7-1 This comment states that the analysis of the Phased Build Alternative may be short-sighted, and that additional environmental benefits may be attributed to the Proposed Project due to its ability to deliver greater amounts of renewable energy. The comment reflects the position that the Proposed Project is needed for the successful development of renewable energy projects. The EIS shows that the Phased Build Alternative would have less capability to transfer energy than the Proposed Project, and the comment asserts that the Proposed Project would therefore add environmental benefits that have not been quantified. As noted in General Response GR-1 the EIS does not define a specific level of need for the Proposed Project (in megawatts of transfer capacity). Further, NEPA requires analysis of a project's impacts as opposed to benefits. See General Response GR-3 for a discussion of achieving California's future renewable energy goals in light of Senate Bill 350 (2015).

The environmental impacts of development of renewable energy projects is discussed in the EIS, based on Section B.7.1, Definition of Connected Action Projects. As such, the EIS recognizes that some generation projects are so closely related to the Proposed Project as to be considered "connected actions," and the EIS also provides information on the environmental impacts of these. The EIS also includes the cumulative projects (Section E) and projects that could fill a remaining growth-inducing capacity. These are categorized in Section A.3, Definition of Connected Actions and Related Projects, and shown in Section F.1.3, Growth Related to Development of Additional Power Generation Facilities.

The comment notes that increasing the renewable energy supply would reduce GHG emissions, and this is consistent with the analysis of Climate Change and GHG emissions in the EIS. Without modeling of changes in generation dispatch inside and outside of California, in scenarios comparing the project and alternatives, it would be speculative to identify any foreseeable changes in emissions from existing or future power plants.

**Comment Set B8 – NextEra Energy Resources LLC**



September 22, 2015

**Via Email**

Billie C. Blanchard and Frank McMenimen  
CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94014  
[westofdevers@aspeneg.com](mailto:westofdevers@aspeneg.com)

**Re: SCE West of Devers Upgrade Project (Application A.13-10-20) – NextEra Comments on the Draft EIR/EIS**

Dear Ms. Blanchard and Mr. McMenimen:

NextEra Energy Resources, LLC ("NEER") hereby submits the following comments on the Draft EIR/EIS for the Southern California Edison ("SCE") West of Devers Upgrade Project (the "Proposed Project"). NEER is a party to the underlying proceeding before the California Public Utilities Commission ("CPUC") relating to SCE's underlying Application A.13-10-20, and has specific concerns regarding the scope of the environmental analysis set forth in the Draft EIR/EIS.

Specifically, NEER has ownership interests in four solar generating facilities and three wind generating facilities in the area potentially affected by the Proposed Project. NEER's indirect subsidiary, Genesis Solar, LLC owns the Genesis Solar Energy Project ("GSEP"), a 250-MW solar thermal generation facility in east Riverside County. GSEP interconnects to the Colorado River Substation and is online. In addition, other NEER indirect subsidiaries own or have an ownership interest in three additional large solar generation facilities in east Riverside County. The 550 MW Desert Sunlight solar photovoltaic project interconnects to the Red Bluff substation and is online. The 250 MW McCoy solar photovoltaic project interconnects to the Colorado River Substation and is online. In addition, the Blythe Solar Power Project is a 485 MW facility under development that will also interconnect at the Colorado River Substation. NEER's wind energy facilities in the region include the following facilities, all of which are online: FPL Energy Cabazon Wind, LLC, FPL Energy Green Power Wind, LLC, and FPL Energy WPP 93 GP, LLC.

Collectively, these facilities (the "NEER facilities") all interconnect with transmission facilities that may be impacted during the construction of the Proposed Project due to interruptions in service. Such interruptions in service would directly and materially harm NEER by reducing the generation from NEER's facilities, resulting in potentially significant economic impacts to NEER.

NextEra Energy Resources, LLC  
700 Universe Boulevard, Juno Beach, FL 33408

B8-1

**Comment Set B8 – NextEra Energy Resources LLC (cont.)**

Furthermore, reductions in the delivery of electrical generation from NEER's facilities likely will be counterbalanced by increased use of non-renewable energy sources by the California market, resulting in increased emissions and related impacts.

**B8-1  
cont.**

NEER is not opposed to the Proposed Project, but does have significant concerns about these issues as detailed below.

**I. Project Objectives**

SCE's Application, and its Proponent's Environmental Assessment (see, e.g., Section 1.3 of that document), set forth a number of Project Objectives (see p. A-5), including, *inter alia*, the following:

- Project Objective 3: "Meet project need while minimizing environmental impacts."
- Project Objective 4: "Facilitate progress toward achieving California's RPS (Renewable Portfolio Standard) goals in a timely and cost-effective manner by SCE and other California utilities."
- Project Objective 5: "Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable."

These Project Objectives collectively would support the goal of minimizing curtailment of existing renewable power generation during construction of the Proposed Project while seeking to meet RPS goals in a timely manner, both of which NEER strongly supports. However, in the Draft EIR/EIS, the CPUC and BLM identified only three basic Project Objectives, not one of which appears to consider the potential impact of the Proposed Project on operational or soon to be operational generator interconnection projects in the region. While NEER supports the agencies' interests in upgrading the West of Devers 220 kV transmission lines to provide increased deliverability of electricity, including from planned interconnection projects (see p. A-11), NEER requests that these objectives be modified to expressly state that the Proposed Project is intended to avoid, or minimize as much as possible, possible service interruptions from active or soon to be active generator interconnection projects in the region, including but not limited to NEER-owned facilities.

**II. Effects on Utilities and Public Services**

On p. D.17-31, Impact UPS-2 is discussed ("Construction would disrupt the existing utility systems or cause a collocation accident"). Specifically, there is mention of the "potential for service interruptions of [ ] utilities," but there is scant mention in the Draft EIR/EIS regarding the possible impacts on existing generation facilities. In fact, the Draft EIR/EIS wholly fails to provide any technical data – let alone analysis – of the potential impacts of the Proposed project on existing generation facilities. Moreover, this section identifies one mitigation measure – UPS-2a ("Protect pipeline and overhead and underground utilities") – but the measure includes no mention of specifically protecting generation from existing facilities, and while "coordination with all pipeline and utility owners" is discussed, there is no mention of coordination with owners and operators of existing generation facilities. Moreover, the measure itself is deficient in that it includes no performance criteria or other benchmarks to evaluate the effectiveness of any "protective measures... to be implemented to protected affected facilities."

**B8-2**

Comment Set B8 – NextEra Energy Resources LLC (cont.)

Because of these deficiencies, NEER requests that the CPUC and BLM undertake studies to detail how the Proposed Project might impact generation from existing facilities in the region, that these studies be discussed in the Draft EIR/EIS, and that appropriate mitigation measures be identified, as appropriate, to address all potentially significant impacts.

B8-2  
cont.

III. Alternatives

As summarized above, NEER is concerned about the Proposed Project's construction schedule on the deliverability of generator interconnection projects. As summarized in the Draft EIR/EIS, CEQA requires analysis of alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..." (CEQA Guidelines, Section 15126.6(a).) However, by eliminating any Project Objective focused on avoiding or minimizing interruptions to deliverability from interconnection projects, the discussion of possible alternatives to the Proposed Project fails to discuss in detail alternatives that would avoid or minimize such impacts. Furthermore, it is not clear how the timing of the Proposed Project and of the contemplated alternatives would affect progress towards achieving the State's renewable policy goals. There is, for example, no comparative discussion of the alternatives relating to contemplated online dates and the construction timelines, duration, and/or the overall transfer capability of the line for renewable interconnection.

B8-3

Consistent with the comments above, we request that the discussion of Alternatives be re-evaluated in the context of a new or revised Project Objective expressly focusing on avoiding or minimizing interruptions to or curtailment of interconnection projects.

Finally, as a general housekeeping measure, please add the following name to the notification list for the Proposed Project in addition to the currently-listed contacts for NEER:

Scott Castro  
Senior Attorney  
NextEra Energy Resources, LLC  
1 Post Street  
San Francisco, California 94104  
[Scott.Castro@NextEraEnergy.com](mailto:Scott.Castro@NextEraEnergy.com)

Thank you for the opportunity to comment on the Draft EIR/EIS. We are hopeful that NEER's concerns will be addressed in additional CEQA and NEPA analyses for the Proposed Project.

Sincerely yours,



Scott N. Castro  
NEXTERA ENERGY  
RESOURCES, LLC

NextEra Energy Resources, LLC  
700 Universe Boulevard, Juno Beach, FL 33408

## Responses to Comment Set B8 – NextEra Energy Resources LLC

**B8-1** The comment is concerned that only three agency-defined Basic Project Objectives appear in the Draft EIR/EIS, and suggests that the objectives should be modified to include an objective that the project is intended to avoid or minimize possible service interruptions during West of Devers construction for operational or soon to be operational generators.

The EIS provides background information on the Proposed Project, as it would be SCE's proposed solution to achieving its Project Objectives (Section A.2.1.3, Review of SCE's Purpose and Need), and the EIS also reviews some of the solutions that presently ensure safe and reliable electric transmission service within the West of Devers corridor (Section C.6.2.1, Current Transmission Plans).

The rationale for selecting each of the CPUC and BLM Basic Project Objectives is presented in EIS Section A.2.3, and General Response GR-2 provides a discussion of the agency-specific Basic Project Objectives as they relate to SCE's objectives.

Any service interruptions required during construction would be coordinated with and authorized by CAISO, which operates the grid. All activities related to transmission construction and operation, and the operation of existing generation facilities in the region, are required to comply with existing regulatory standards and oversight framework, including those applicable to planned service interruptions. This ensures safe and reliable service that is cost-effective, while minimizing environmental impacts. Existing generators are expected to operate in compliance with this framework. These generators would be physically unchanged by the project and no environmental impacts related to service interruptions from generators interconnected to the transmission system are identified. The concerns expressed in the comment appear to be economic rather than an environmental in nature.

**B8-2** The comment requests a discussion regarding the effects of the Proposed Project on existing generation facilities in the region, and the comment suggests that owners and operators of power plants should be included in Mitigation Measure UPS-2a (Protect pipeline and overhead and underground utilities).

The EIS focuses on identifying the foreseeable and potentially significant environmental effects that are physical impacts, including unplanned disruptions of service systems for gas, electricity and water and collection systems such as for stormwater and wastewater. Because the project would physically cross a large number of electrical or utility systems and could result in collocation accidents that themselves would have environmental impacts, Mitigation Measure UPS-2a (Protect pipeline and overhead and underground utilities) addressing this possibility was included in the EIS.

The Proposed Project is not anticipated to have direct or indirect environmental effects that are physical impacts on existing generation facilities in the region. The existing generators would be unchanged by the project. While planned and unplanned outages along the existing or nearby transmission lines could potentially result in temporary curtailment of the existing generators, for the reasons discussed below it is not practical to identify or analyze potential environmental effects of such outages now because doing so would require pure speculation as to when/where such outages would take place and where replacement electricity would originate. While other generators would be available to ensure that safe and reliable delivery of electricity continues uninterrupted, it is impractical now to identify



where that generation would come from and what source of power would be utilized. For example, the EIS shows that the No Project Alternative could “increase the reliance on non-renewable energy and increase the dispatch and use of more-costly or less-efficient power plants within the Los Angeles Basin” until an alternative project could be developed (Section C.6.3.1, No Project Alternative Option 1). However, as noted in Section B.3.10 (Description of the Proposed Project, Construction Schedule and Sequence) any short- or long-term transmission line outages to facilitate construction would typically be scheduled through and subject to the approval of the CAISO. Electricity dispatch would be coordinated as usual given the available capacity of the remainder of the transmission system. It is not possible at this time to know any detail regarding specific outages or temporary curtailment for a given generator, and it would not be necessary to implement mitigation for the owners and operators of these facilities.

- B8-3      The comment is concerned that greater detail should be provided regarding the potential interruptions experienced by generators as a result of the construction schedule for the project and alternatives. The comment requests revising the objectives to expressly focus on minimizing interruptions to or curtailment of generators. The EIS shows that SCE’s final engineering and procurement activities, acquisition of any necessary property rights, and receipt of other applicable permits will influence the construction schedule for the project, as well as the alternatives (Section B.3.10, Construction Schedule and Sequence). The EIS also generally compares the construction schedules for the project and alternatives in the context of the anticipated environmental effects in Section G.4, Comparison of Alternatives. See Response to Comment B8-1 on the topic of revising the objectives to reduce possible service interruptions from generators.

## Comment Set B9 – California Independent System Operator Corporation



California Independent System Operator Corporation

September 22, 2015

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104  
[westofdevers@aspenerg.com](mailto:westofdevers@aspenerg.com)

**RE: CAISO Comments on the West of Devers Upgrade Project Draft Environmental Impact Report**

Dear Ms. Blanchard;

### I. Introduction

The California Independent System Operator Corporation (CAISO) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) prepared for the West of Devers Upgrade Project (Proposed Project) by the California Public Utilities Commission (CPUC). The CAISO is very concerned that the DEIR's Phased Build Alternative has not been adequately tested, may not meet the identified, immediate need for the Proposed Project, and will inappropriately restrict future development of renewable generation necessary to effectively and efficiently meet California's clean energy goals. The CAISO is specifically concerned that the DEIR does not use the renewable portfolios developed by the CPUC and used in the CAISO's transmission planning process to analyze the need for the Proposed Project. Further, the DEIR does not adequately explore issues, including potentially adverse environmental impacts, associated with further expansion of the Phased Build Alternative.

In accordance with its generator interconnection process tariff provisions, the CAISO initially identified the Proposed Project as necessary to connect certain renewable generation projects in the CAISO's interconnection queue to the CAISO grid. Subsequently, the CAISO confirmed the need for the Proposed Project in its Transmission Planning Process studies of public policy driven projects. The CAISO's public policy driven studies seek to identify transmission necessary to interconnect expected future renewable generation projects to meet State clean energy goals based on CPUC-developed renewable portfolios.

The CAISO's comments on the DEIR focus on two concerns with the selection of the Phased Build Alternative as the environmentally superior alternative: (1) whether the DEIR properly defines project objectives and selects alternatives that meet those objectives; and (2) critical flaws in the technical analysis of alternatives to the Proposed Project. The CAISO has no comments regarding the Tower Relocation Alternative or the Iowa Street 66 kV Underground Alternative.

B9-1

## Comment Set B9 – California Independent System Operator Corporation (cont.)

Page 2 of 10

California Independent System Operator Corporation

### II. Discussion

#### A. The DEIR Improperly Defines and Assesses Basic Project Objectives.

The DEIR defines the “Basic Project Objectives” for the Proposed Project as follows: (1) “to upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW,” (2) “to support achievement of State and federal renewable energy goals” and (3) “to maximize the availability of remaining space in the corridor to the extent practicable, so future use of the corridor for additional transmission line upgrades is not precluded.”<sup>1</sup> However, the DEIR’s analysis of Basic Project Objective 2 does not align with the CAISO’s and the CPUC’s processes for identifying and approving public policy driven transmission projects. Instead, the DEIR focuses on interconnection queue information in isolation and does not reflect or take into account the renewable energy portfolios developed by the CPUC or the environmental and resource potential assessments already considered by the CPUC RPS analysis. Because the increased system deliverability discussed in Basic Project Objective 1 is directly related to achieving renewable energy goals, the flawed analysis with respect to Basic Objective 2 results in an inaccurate system deliverability number.

##### 1. The DEIR’s analysis of Basic Project Objective 2 does not reflect the Renewable Portfolio Standard (RPS) goals and portfolios developed by the CPUC.

As stated above, the CAISO initially identified the need for the Proposed Project as part of the generator interconnection process and subsequently affirmed the project’s need based on studies of public policy driven projects in the transmission planning process. Importantly, the CAISO bases its transmission planning process policy studies on the RPS portfolios developed by the CPUC. Thus, the CAISO determined that the Proposed Project was needed based on RPS portfolios developed by the CPUC and provided to the CAISO for use in the CAISO’s transmission planning process. As stated in the CAISO’s 2014-2015 transmission plan:

...The CPUC plays a primary role formulating the resource portfolios as the agency that oversees the supply procurement activities of the investor-owned utilities and retail direct access providers, which collectively account for 95 percent of the energy consumed annually within the [CAISO] area. The proposed portfolios are reviewed with stakeholders to seek their comments, which are then considered for incorporation into the final portfolios.

The resource portfolios have played a crucial role in identifying public policy-driven transmission elements. Meeting the RPS has entailed developing substantial amounts of new renewable generating capacity, which will in turn required new transmission for delivery. The uncertainty as to where the generation capacity will locate has been managed recognizing this uncertainty and balancing the requirement to have needed transmission completed and in service in time to support the RPS against the risk of building transmission in areas that do not realize enough new

<sup>1</sup> SCE West of Devers Upgrade Project, Executive Summary, pp. ES-6-ES-7.

## Comment Set B9 – California Independent System Operator Corporation (cont.)

Page 3 of 10

California Independent System Operator Corporation

generation to justify the cost of such infrastructure. This entailed applying a “least regrets” principle, which first formulates several alternative resource development portfolios or scenarios, then identifies the needed transmission to support each portfolio followed by selecting for approval those transmission elements that have a high likelihood of being needed and well-utilized under multiple scenarios.<sup>2</sup>

B9-2  
cont.

The DEIR gauges attainment of Basic Project Objective 2 by seeking to ensure that the various alternatives can achieve some level of additional renewable generation development; however, the DEIR fails to reference the volumes of renewable energy reflected in the CPUC-developed renewable generation portfolios. The CPUC’s renewable generation portfolios serve as the basis for the CAISO’s deliverability analyses and, as a result, are critical in defining project objectives and driving the need for policy driven projects. In defining the Basic Project Objectives, the DEIR fails to acknowledge the central role of CPUC-developed renewable generation portfolios in the transmission planning process. As such, the DEIR’s analysis and conclusions are inconsistent with the CPUC’s own RPS studies and portfolios that are intended to drive both renewable procurement by load serving entities and the identification of needed transmission upgrades to ensure achievement of the State’s RPS goals.

The CPUC and the CAISO have acknowledged the importance of agency coordination in developing and studying the renewable energy portfolios to identify policy driven transmission projects. This was most recently reiterated in the March 11, 2015 letter from CPUC President Picker (CPUC) and California Energy Commission Chairman Weisenmiller (CEC) to Steve Berberich, CAISO President and Chief Executive Officer, regarding Base Case Renewable Resource Portfolio and an Alternative Renewable Resource Portfolio for the CAISO 2015-2016 Transmission Planning Process.<sup>3</sup> In this letter, the CPUC and CEC recommended specific renewable energy portfolios for the CAISO to study in its 2015-2016 transmission plan. This letter also refers to the May 2010 Memorandum of Understanding (MOU) between the CAISO, the CPUC and the CEC which called for increased transmission planning coordination, especially with regard to policy driven projects. Specifically, the MOU notes that CAISO will present “a formal assessment of the transmission planning needs within the [CAISO] balancing authority area for the CPUC-provided renewable resource scenarios.”<sup>4</sup> This reinforces that the CPUC-developed renewable energy portfolios drive project objectives and need.

Although the CAISO understands that the CPUC-developed portfolios are not the only information relevant to achieving renewable energy goals, any additional information should complement and support the development of plans capable of meeting the portfolios. Such information should not undermine achievement of the CPUC’s portfolios. The DEIR’s focus is narrow in this regard because it merely cites to the CAISO’s interconnection queue and notes that the alternative projects meet current

<sup>2</sup> CAISO 2014-2015 Board of Governor Approved Transmission Plan, March 27, 2015, pp. 20-21.

<sup>3</sup> [http://www.cpuc.ca.gov/NR/rdonlyres/CRD2FA01-E466-45C1-984B-663C7B827182/0/2015\\_16TPP\\_Portfoliotransmittal\\_ltr.pdf](http://www.cpuc.ca.gov/NR/rdonlyres/CRD2FA01-E466-45C1-984B-663C7B827182/0/2015_16TPP_Portfoliotransmittal_ltr.pdf)

<sup>4</sup> Attachment A, Memorandum of Understanding between the CPUC and CAISO Regarding the Revised CAISO Transmission Planning Process, p. 2.

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interconnection queue needs.<sup>5</sup> The DEIR ignores that the Proposed Project is also designed to meet much broader public policy goals, in particular, providing accesses to other generation reflected in the CPUC's RPS portfolios. Reviewing the interconnection queue information may be helpful as a directional indicator; however, that narrow review should not—and cannot—form the basis for an analysis of whether the proposed alternatives meet the State's renewable energy goals. The CPUC has separately identified the targeted RPS portfolios for achieving the state's energy goals.

In its only substantive reference to the CPUC-developed portfolios, the DEIR notes that discussions with CPUC RPS staff led to the conclusion that renewable resource shortfalls resulting from an alternative with less capacity than the Proposed Project could be accommodated by increased renewable development in other locations.<sup>6</sup> However, this conclusion erroneously assumes that the only consideration for siting renewable projects in the CPUC-developed portfolios is the sufficiency of transmission. The conclusion does not take into account all other factors considered in determining the renewable resources selected in the RPS portfolios, such as resource potential, cost and environmental issues. It does not appear that the CPUC RPS staff was consulted as to whether it would be appropriate or desirable to reassign assumed renewable energy development based solely on transmission considerations.<sup>7</sup> A DEIR is not the appropriate forum to effectuate a change in the CPUC's RPS portfolios, and it undermines the processes that have been established to identify RPS portfolios and identify transmission needed to meet the State's RPS goals.

The CAISO recognizes that time has passed since SCE submitted the initial application for the Proposed Project. As a result, the DEIR needed to take into account updated information. However, the CAISO believes that the updated information should have been based on the CPUC-developed renewable energy portfolios provided in the 2014-2015 planning cycle and the resulting conclusions developed in the 2014-2015 transmission plan.

The CAISO will develop testimony in this proceeding relying on the most up-to-date available information, which is currently the CPUC-developed RPS portfolios provided to the CAISO for use in the 2015-2016 transmission planning cycle.<sup>8</sup>

B9-2  
cont.

<sup>5</sup> DEIR Appendix 5, Project Alternatives Assessment, pp. 10-12.

<sup>6</sup> DEIR Appendix 5, p. AP-5-53.

<sup>7</sup> DEIR Appendix 5, p. AP-5-53. ("The EIR/EIS preparers asked CPUC RPS Staff to test the "RPS Calculator" to show how future renewable resource portfolios might change with a smaller upgrade to WOD than SCE has proposed. With RPS Calculator V.5: there would be no additional transmission capacity needed elsewhere in the state to make up for generation decreased in Riverside East; and renewable generation in Westlands or other zones (including San Diego South and Solano) would replace the generation decreased in Riverside East, using existing transmission capacity available in the other zones. With RPS Calculator V.6.1: there would be no impact on the generation selected in Riverside East or elsewhere.")

<sup>8</sup> [http://www.cpuc.ca.gov/NR/rdonlyres/C8D2FA01-E466-45C1-984B-663C7B827182/0/2015\\_16TPP\\_PortfolioTransmittal\\_Ltr.pdf](http://www.cpuc.ca.gov/NR/rdonlyres/C8D2FA01-E466-45C1-984B-663C7B827182/0/2015_16TPP_PortfolioTransmittal_Ltr.pdf).

## Comment Set B9 – California Independent System Operator Corporation (cont.)

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**2. The DEIR and Basic Project Objectives 1 and 2 do not meaningfully consider potentially higher renewable energy goals.**

B9-3

Although Basic Project Objective 2 identifies the need “to support achievement of State and federal renewable energy goals,” the DEIR analysis did not materially consider potential renewable energy goals in excess of the current 33% by 2030 legislative requirement. Instead, Basic Project Objective 1 narrowly defines the goal of increasing deliverability by “at least 2,200 MW.” This limited goal is not informed by potentially higher renewable energy goals that have recently been considered by the legislature, the Governor and the CPUC itself. Because the Basic Project Objective 1 is narrowly drafted, the DEIR’s preferred alternative, the Phased Build Alternative, is not tailored to meet higher renewable energy goals.

During the preparation of the DEIR, the Governor and the state legislature were actively engaged in efforts to increase the State’s renewable energy goals. In addition, in the context of the long-term procurement plan proceeding, the CPUC has studied scenarios with renewable energy goals in excess of 33%.<sup>9</sup> The DEIR analysis does not account for potentially higher renewable energy goals, and the DEIR was issued prior to the legislature’s passage of Senate Bill 350 directing investor owned utilities to achieve to a 50% RPS by 2030.<sup>10</sup>

The DEIR notes that additional capacity can be added to the Phased Build Alternative in the future if additional upgrades are needed.<sup>11</sup> The DEIR states that this may be accomplished by either constructing a new circuit in the existing transmission corridor or by reconductoring the Phased Build Alternative at a later date. Although the DEIR acknowledges the potential impacts of those later steps, it does not explore them in sufficient detail to support the Phased Build Alternative. Specifically, the CAISO believes that the following factors must be analyzed in greater detail prior to determining whether the Phased Build Alternative is preferred over the Proposed Project:

- a. The cost and environmental impacts of salvaging the upgraded towers and building additional transmission lines in the future, as well as reconductoring the newly constructed double circuit line under the Phased Build Alternative;
- b. The challenges in obtaining outages that will be necessary to allow the construction of the Phased Build Alternative, which will become more difficult in the future as increased amounts of renewable generation come on line, as well as the potentially higher lost generation production under the Phased Build Alternative.
- c. Higher resistive losses incurred under the Phased Build Alternative, contributing to higher energy costs and greenhouse gas emissions. The CAISO expects that use of Drake

B9-4

<sup>9</sup> Assigned Commissioner’s Ruling on Updates to the Planning Assumptions and Scenarios for Use in the 2014-2015 Long-Term Procurement Plan and the California Independent System Operator’s 2015-2016 Transmission Planning Process, March 4, 2015, p. 42.

<sup>10</sup> [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=2015201605B350](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=2015201605B350)

<sup>11</sup> DEIR Executive Summary, p. ES-16.

**Comment Set B9 – California Independent System Operator Corporation (cont.)**

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1-795 ACCR will have approximately four times the resistive losses of 2B-1590 ACSR. There appears to be no quantification of the expected cost implications or consideration of the environmental impact of such significant additional line losses.<sup>12</sup> The increased losses are an environmental and policy issue, especially given the state's emphasis on energy efficiency and reduced greenhouse gas emissions.

B9-4  
cont.

**B. The DEIR's Alternative Analysis Requires Technical Clarification.**

1. **The alternative analysis relies on an incorrect calculation of deliverability need for generators in the CAISO's interconnection queue.**

B9-5

As stated in Section II.A of these comments, the CAISO believes that the project objectives should be defined and assessed based on the CPUC-developed renewable energy portfolios and the CAISO's policy driven transmission planning studies based on those portfolios. However, the alternative analysis conducted in the DEIR aims to increase system deliverability by "at least 2,200 MW" based solely on projects identified in the CAISO's interconnection queue. In addition to disagreeing with this unduly limited approach to defining project objectives, the CAISO has reviewed the analysis and has identified certain technical clarifications that should be addressed in the DEIR.

The DEIR's 2,200 MW deliverability target is based solely on an analysis of projects in the CAISO's interconnection queue. The DEIR notes that "the [transmission cluster] Phase 2 study indicated a need to provide deliverability for ~2200 MW of new queued generation projects; and whereas the CAISO response to the first set of Data Requests indicates a level of 1881 MW (nearly five years later)."<sup>13</sup> These statements do not provide a complete picture of current interconnection needs and cannot serve as the basis for establishing the appropriate deliverability limit.

In particular, this analysis fails to acknowledge that the 1,881 MW of generation in the CAISO interconnection queue is incremental to the 985 MW of generation currently receiving Full Capacity Deliverability Status through the West of Devers interim upgrade. The West of Devers interim upgrade is not an acceptable or approved long term solution to provide deliverability because it is not capable of operating with the capacity additions in the Proposed Project. Instead, the interim upgrade will be removed and replaced by the Proposed Project. Accordingly, based on the information that was available during preparation of the DEIR, the project selected in this proceeding would need to support deliverability for at least an additional 2,866 MW (1,881 MW of queued generation plus 985 MW of existing and queued generation) to accommodate all projects requesting interconnection through Cluster 7 of the CAISO's generator interconnection process.

<sup>12</sup> See DEIR, Appendix 5 p. AP-5-55. ("Line losses: ACCR material has higher electrical losses. These losses would result in economic consequences, but these would have to be compared to the reduced construction cost achieved from the reuse of the existing 220 kV towers.")

<sup>13</sup> DEIR Appendix 5, Project Alternatives Assessment, p. 6.



## Comment Set B9 – California Independent System Operator Corporation (cont.)

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California Independent System Operator Corporation

The CAISO stresses, however, that this information is out dated because currently 3,631 MW of incremental generation is seeking interconnection and Full Capacity Deliverability Status in Cluster 8 of the CAISO's interconnection process. The CAISO does not imply that system reinforcements should be sized to accommodate all generation in the interconnection queue, but rather the constant (and significant) state of change in the interconnection queue further reinforces the need for holistic, more-forward looking planning based on the policy-driven portfolios developed by the CPUC.

B9-5  
cont.

**2. The DEIR reflects a misunderstanding and misinterpretation of the CAISO reliability-driven and policy-driven analyses.**

B9-6

The DEIR inappropriately uses the CAISO's 2024 Reliability base case to establish deliverability provided by alternatives to the proposed project.

The DEIR specifically notes as follows:

The CAISO's 2024 Reliability base case, from the CAISO's 2013/2014 transmission planning process (one of the base cases used in the alternative analysis) represents the view from the CAISO's and SCE's perspective (a collaborative effort) of the level of generation deemed viable (based on a number of criteria) and to be in place and operational in 2024. The generation level within the Eastern Bulk system for the region under analysis (refer to Table A4 in Appendix A) is:

- Total Generation On-line: 3754 MW
- Total Generation Capacity: 6901 MW<sup>14</sup>

The DEIR incorrectly states that these quantities reflect the view of the CAISO and Southern California Edison Company (SCE) regarding the level of generation deemed viable and that will be in place and operational in 2024. The generation portrayed in the 2024 Reliability case simply reflects a share of the CPUC-developed portfolio amounts that was allocated to the ISO-controlled grid, with other shares allocated to the Imperial Irrigation District (IID) through the location of resources making up the portfolio amounts. Furthermore, the CAISO adjusts dispatch as necessary in the reliability base case to adequately test the reliability of the system.

In contrast, the CAISO 2013-2014 policy-driven analysis relied upon the "commercial interest (base)" portfolio provided by the CPUC. The 2014-2015 transmission plan used this same base case portfolio, noting that this "portfolio was identified as the appropriate base case for the ISO to study in its 2014-2015 transmission planning process because it represents the most likely path of renewable development in the future."<sup>15</sup> Unlike the reliability base case, the policy-driven analysis seeks to ensure deliverability for the renewable energy portfolio and does not adjust dispatch to test reliability.

<sup>14</sup> DEIR Appendix 5, Project Alternatives Assessment, p. 5.

<sup>15</sup> CAISO 2014-2015 Transmission Plan, p. 177.



## Comment Set B9 – California Independent System Operator Corporation (cont.)

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3. **The DEIR analysis relies on import level from IID that is inconsistent with the renewable generation portfolios and current CPUC direction.**

B9-7

The DEIR analysis relies on incorrect assumption that 1,400 MW imports will be realized from IID.<sup>16</sup> The CAISO recognizes that at the time SCE developed its application, procurement for achieving the 33% RPS objective was not completed, and the CPUC had provided direction to investor owned utilities to conduct procurement assuming that up to 1,400 MW of renewable generation could be deliverable from within IID.<sup>17</sup> However, the CPUC subsequently revised that directive and clarified that the investor owned utilities should no longer assume a maximum import capability of 1,400 MW from IID.<sup>18</sup>

This change in circumstance further supports the need to rely on the CPUC-developed renewable portfolios developed specifically for long term transmission planning purposes.

4. **The DEIR methodology for assessing the impacts of the Phased Build Alternative on generation development appears to be based on a comparative benchmarking rather than an explicit study of deliverability.**

B9-8

The CAISO's deliverability methodology is publicly available, extensively documented, and fully vetted through the transmission planning process. Rather than performing a comparative analysis of the project alternatives, the CAISO suggests that its deliverability analysis be used to determine whether the preferred alternatives provide the necessary deliverability. The CAISO intends to conduct this deliverability analysis and present its results in prepared direct testimony in A.13-10-020.

5. **The DEIR incorrectly implies that the Phased Build Alternative satisfies Project Alternatives Assessment Case #4.**

B9-9

In the Project Alternatives Assessment,<sup>19</sup> the DEIR studies the capabilities of the Proposed Project and Phased Build Alternative to meet selected study cases. Case #4 specifically studies the CAISO Cluster 7 Phase 1 generation levels. The analysis states that:

the purpose of evaluating this case and associated sensitivities was to establish and determine an upper end of the loading spectrum. If the proposed 795 Drake ACCR conductors can withstand the extra loading imposed by the higher penetration of

<sup>16</sup> DEIR Appendix S, p. AP-S-48. ("Based on power flow modeling completed for this alternative (see results in Table A3 in Attachment 2 to this appendix), this alternative satisfies the CAISO's 2024 Reliability Base Case, which includes specific generation projects that the CAISO has determined to be most likely to be constructed plus a scenario of 1,400 MW from IID to the CAISO.")

<sup>17</sup> CPUC Decision (D.) 12-11-016.

<sup>18</sup> D.14-11-042, p. 116. ("It is reasonable to remove the Commission's requirement to assume a maximum import capability of 1,400 MW from IID Balancing Authority Area as directed in June 7, 2011 ACR and D.12-11-016.")

<sup>19</sup> DEIR Appendix S, Project Alternatives Assessment.

## Comment Set B9 – California Independent System Operator Corporation (cont.)

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generation modeled in this base case, then the other less stressed scenarios will pass the test.<sup>20</sup>

The Project Alternative Assessment concludes that the Proposed Project satisfies Case #4. However, there is no indication whether the Phased Build Alternative satisfies Case #4. Specifically, the narrative indicates that the **Proposed Project** has “no overloading of facilities and the worst loading is on the Devers–Vista circuit at 56% and 68% under single and double contingencies respectively.” Because the Phased Build Project conductor has an emergency ampacity equal to only 47% of Proposed Project, the observed 56% and 68% loading would exceed the capability of the proposed conductor for the Phased Build Alternative. Based on this narrative, it appears the Phased Build Alternative would not satisfy Project Alternative Assessment Case #4.

6. The DEIR does not provide sufficient detail regarding specific impacts of the Phased Build Alternative.

The Phased Build Alternative consists of (1) replacing two single circuit towers with a new double circuit tower capable of supporting 2-1590 ACSR conductors but strung with 1-795 ACCR conductor, and (2) strengthening and/or raising a portion of the existing double circuit tower and re-stringing it with 1-795 ACCR. The level of detail provided in the DEIR is not sufficient for the CAISO to develop a specific recommendation regarding the Phased Build Alternative at this time, other than to identify certain concerns and the need for additional information. In any event, the CAISO believes the following concerns related to the Phased Build Alternative should be addressed in the Final Environmental Impact Report:

- a. Using a smaller single conductor is not identified as having any materially different environmental impact during construction, but the need to re-string in the future will have an additional environmental impact in an area presumably recovering from the initial construction disturbance. This additional impact should be included in the analysis of the Phased Build Alternative.
- b. Accommodating future outages to a double circuit line (after additional renewable generation has connected to the grid and is dependent on the circuits) may be more challenging and will could result in increased curtailment of renewable generation during the construction period, causing negative environmental and market impacts, especially if both circuits need to be de-energized during construction. The CAISO notes that it is not likely that one circuit can be re-strung with an energized line on the adjacent tower position.
- c. Using the smaller conductor on the new construction increases transmission line losses on those circuits approximately by a factor of four, which raises both

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<sup>20</sup> DEIR Appendix 5, Project Alternatives Assessment, p. 10-11.

B9-9  
cont.

B9-10

B9-11

## Comment Set B9 – California Independent System Operator Corporation (cont.)

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environmental and policy issues given the State's energy efficiency objectives. In addition it is inefficient and ultimately increases costs.

The CAISO has not yet conducted a complete review of these issues, and makes no specific recommendation at this time. However, the apparent inconsistencies identified above should be addressed in the Final Environmental Impact Report.

### III. Conclusion

The CAISO appreciates the opportunity to provide these comments on the DEIR and looks forward to presenting more detailed analysis in the context of A.13-12-020.

Respectfully,

/s/ Delphine Hou  
Delphine Hou  
External Affairs Manager

B9-11  
cont.

B9-12

**Comment Set B9 – California Independent System Operator Corporation (cont.)**

**ATTACHMENT A**

Comment Set B9 – California Independent System Operator Corporation (cont.)

**Memorandum of Understanding  
Between  
The California Public Utilities Commission (CPUC)  
And  
The California Independent System Operator (ISO)  
Regarding  
The Revised ISO Transmission Planning Process**

B9-13

The ISO has proposed revisions to its transmission planning process to enable the ISO to identify the transmission infrastructure needed to achieve certain state policy targets including, but not limited to, 33 percent renewable generation procurement by load serving entities by 2020.

The CPUC develops renewable generation portfolio scenarios as part of its Long Term Procurement Plan process that will assist the ISO in identifying transmission projects needed under various renewable generation location assumptions and developing a comprehensive transmission plan.

The CPUC and the ISO desire to work together to coordinate the ISO's revised transmission planning process and identification of needed transmission infrastructure with the CPUC's subsequent siting/permitting processes.

The revised ISO transmission planning process will provide opportunities for the ISO and the CPUC to coordinate the ISO's scenarios analysis and development of the ISO's comprehensive transmission plan with the CPUC's siting/permitting processes.

Accordingly, the CPUC and the ISO agree to the following:

1. The California Transmission Planning Group process, which is a major part of Phase 1 of the ISO transmission planning process, will develop an annual statewide conceptual transmission plan that will become the starting point for further review and analysis in Phase 2 of the ISO transmission planning process. The ISO and the CPUC will participate in the California Transmission Planning Group process to incorporate, to the extent practical, alternative planning scenarios that will enable that effort to identify an initial set of needed "least regrets" transmission facilities for consideration in TPP Phase 2.
2. In Phase 2 of the 2010-2011 cycle of the ISO transmission planning process, the ISO will consider and incorporate into its plan scenarios from the CPUC Long Term Procurement Plan process, to the maximum extent practical given the goal of identifying needed renewable access elements of the Phase 2 plan by December 2010. The CPUC will provide notice that Phase 2 of ISO transmission planning process will consider and incorporate these scenarios, and the subsequent CPUC siting/permitting process will then give substantial weight to project applications that are consistent with the ISO's final Phase 2 plan.
3. The CPUC and the ISO will review the results of the California Transmission Planning Group modeling phases and evaluate their implications for the transmission needs of the CPUC's Long Term Procurement Plan renewable resource scenarios. The ISO will subsequently seek, within the time and human resource constraints of Phase 2 of the

Comment Set B9 – California Independent System Operator Corporation (cont.)

transmission planning process, to provide the CPUC and other stakeholders with a formal assessment of the transmission planning needs within the ISO balancing authority area for the Long Term Procurement Plan renewable resource scenarios.

4. CPUC and ISO will determine a process for subsequent cycles of the ISO transmission planning process, by which the ISO will formally assess scenarios provided by the CPUC. Provided the CPUC meets parameters agreed to by both parties with regards to the number, timing, and format of the scenarios, the ISO will provide CPUC and other stakeholders with a formal assessment of the transmission planning needs within the ISO balancing authority area for the CPUC-provided renewable resource scenarios.
5. For Phase 2 of the transmission planning process, the ISO will conduct a stakeholder process that complies with Order 890 of the Federal Energy Regulatory Commission (FERC) and allows meaningful public participation to ensure that appropriate study assumptions and scenarios are identified to support development of the final Phase 2 plan. Stakeholders will have opportunities to comment on published drafts of the Phase 2 plan, as well as on the final Phase 2 plan that will be submitted for approval to the ISO Board of Governors. The final Phase 2 plan for the ISO balancing authority area will reflect the ISO's consideration of all stakeholder comments and recommendations received during the planning process.
6. The final Phase 2 plan will identify specific needed transmission facilities, and will distinguish between Category 1 facilities which merit unconditional approval based on the concept of "least regrets," versus Category 2 facilities which may be needed depending on the course of future generation development.
7. The facility specifications in the final Phase 2 plan will provide sufficient detail to enable eligible parties to develop and submit, in Phase 3, proposals to build the Category 1 facilities, including construction schedules and detailed cost estimates. During the next annual cycle of the California Transmission Planning Group and ISO transmission planning processes, parties may suggest alternatives to the Category 2 facilities, and the ISO will re-evaluate these facilities and consider any submitted alternatives in developing the next annual transmission plan.
8. ISO participating transmission owners and other parties will have opportunities to build elements of the final Phase 2 plan that are not covered under transmission categories assigned to participating transmission owners to build under the ISO tariff. Parties may propose to build specific Category 1 facilities identified in the Phase 2 plan, or, for Category 2 facilities, may propose alternative elements to meet the same functional needs.
9. Proposals to build specific Category 1 transmission facilities that are identified in the final Phase 2 plan would proceed directly to the CPUC and/or other siting authorities for Certificate of Public Convenience and Necessity, California Environmental Quality Act and other siting/permitting requirements.
10. In cases where two or more proposals are submitted and found by the ISO to be technically acceptable for constructing the same Category 1 facility, the CPUC will choose, as needed, between two or more CPUC-jurisdictional proposals. In cases where two or more duplicative project proposals are all being considered by the same siting authority, the ISO will defer to the siting authority to choose between the projects. In cases where two or more duplicative project proposals are being considered by different siting authorities, the ISO will choose among the proposals based on objective criteria to be established.
11. The CPUC and ISO recognize that this Memorandum of Understanding is being

B9-13  
cont.

Comment Set B9 – California Independent System Operator Corporation (cont.)

completed based on the ISO's revised transmission planning process proposal, which will be submitted to FERC in the near future, and which the subsequent FERC order could modify. If any FERC-ordered modifications substantively affect the terms of this Memorandum of Understanding, the CPUC and ISO will collaborate to develop appropriate revisions to the Memorandum of Understanding.

B9-13  
cont.

The CPUC and the ISO understand and agree to the terms of this Memorandum.

California Public Utilities Commission

By: Michael D. Peevey  
Name: Michael Peevey  
Title: Commission President

Date: 5-13-10

By: Paul Clanton  
Name: Paul Clanton  
Title: Executive Director

Date: 5-13-10

California Independent System Operator Corporation

By: Y. Mansour  
Name: Yakout Mansour  
Title: President and CEO

Date: 5-13-10

## Responses to Comment Set B9 – California Independent System Operator Corporation

- B9-1 The comment reflects concerns that the Phased Build Alternative may require more analysis, may not meet the previously identified need for the project, and may restrict future development of renewable generation. The comment also introduces concerns on the topic of the renewable resource portfolios that are used in the CAISO Transmission Planning Process, as transmitted to CAISO from the CPUC, and how those portfolios should be used in the development of project-level alternatives. The comment also provides an introduction of concerns that CAISO has regarding environmental impacts and potential future phases associated with the Phased Build Alternative, which are addressed in more detail in Comment B9-10.

As noted by the comment, and as discussed EIS Section A, the Proposed Project was originally identified by CAISO to accommodate certain renewable energy generation projects and for fulfilling specific Large Generator Interconnection Agreements (LGIAs). According to the comment, CAISO subsequently “confirmed” the need for the Proposed Project through the study of public policy-driven renewable energy projects that were based on the CPUC-developed portfolios. To capture this history, the EIS Basic Project Objective 1 recognizes that initial identification for the Proposed Project came in 2010 as a result of 2,200 MW of interconnection requests from five renewable energy generation projects (EIS Section A.2.1.4, Interconnecting Planned Generation Resources).

General Response GR-1 (Project Need) addresses how each individual transmission element that is the subject of an application for a CPCN must be independently evaluated within the CPUC general proceeding. As such, the EIS does not determine or define any level of need for the Proposed Project or any alternative. Note also that General Response GR-2 (Agency-defined Basic Project Objectives) provides a discussion of the agency-specific Basic Project Objectives.

General Response GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) provides further information on the topic of how RPS portfolios from the transmission planning process may be considered in the assessment of project-level need.

- B9-2 The comment asserts that Basic Project Objective 2 does not reflect RPS goals or the portfolios that are used in the CAISO Transmission Planning Process. The comment includes a copy of the May 2010 MOU between CAISO and CPUC on the Revised ISO Transmission Planning Process (Comment B9-13). General Response GR-2 provides a discussion of the agency-specific Basic Project Objectives and background on how the Basic Project Objectives are used in the proper NEPA consideration of alternatives.

This comment describes the need for the Proposed Project as being “affirmed” during studies of public policy-driven renewable energy projects in the CAISO Transmission Planning Process that occurred after the initial identification of the Proposed Project for fulfilling certain LGIA’s. The comment points to the CAISO’s 2014-2015 Transmission Plan in stating that “the CAISO determined that the Proposed Project was needed based on RPS portfolios.” In light of CAISO’s opinion on project need, note that the EIS does not define a specific level of need for the Proposed Project (in megawatts of transfer capacity) as none was provided as a specific project objective.



Contrary to the assertion of the comment, the EIS does not attempt to “effectuate a change” in the RPS portfolios. The EIS provides information on project alternatives under the premise that transmission planning process does not limit the consideration of project-level alternatives. General Response GR-3 provides more information on this topic. As described in General Response GR-1 (Project Need), each individual transmission element that is the subject of an application for a CPCN must be independently evaluated, and General Response GR-2 (Agency-defined Basic Project Objectives) shows that the scope of alternatives in the environmental review must not be unduly limited.

See General Response GR-3 for more information on how the EIS determines consistency with Basic Project Objective 2, and the overview in GR-3 of the project-level environmental review process as it relates to the Revised CAISO Transmission Planning Process of the May 2010 MOU. The Proposed Project predates the Revised CAISO Transmission Planning Process that was established with the May 2010 MOU. This means that CAISO’s initial studies of “public policy driven” renewable resource portfolios occurred after the initial identification of the Proposed Project for interconnecting 2,200 MW of generation. Because of this timing, the 2010-2011 and subsequent transmission plans incorporate the Proposed Project as a “base case” transmission addition for specific generation projects rather than being formally categorized as “policy-driven” for the renewable portfolios. Technical details on how updated portfolios are reflected within the power flow analysis appear in Response to Comment B9-6.

The comment indicates that CAISO intends to present testimony in the CPUC general proceeding (A.13-10-020) regarding the transmission needed for the renewable portfolios, and how the portfolios relate to the interconnection queue. General Response GR-1 notes that the overall level of project need will be addressed within the general proceeding.

B9-3

The comment asserts that Basic Project Objective 2 should consider potentially higher renewable energy goals, and that Basic Project Objective 1 is too narrow. The EIS recognizes that a key objective of the Proposed Project is to increase the power transfer capability of the corridor’s transmission facilities (EIS Section A.2.1.4, Interconnecting Planned Generation Resources). However, as discussed in General Response GR-2, the objectives listed by SCE in its PEA for the Proposed Project included no minimum generation level goals. Accordingly, Basic Project Objective 1 specifies a minimum level of deliverability for the EIS scope of alternatives.

General Response GR-3 provides further information on how consistency with Basic Project Objective 2 was assessed in the development of alternatives. The EIR does not evaluate whether any alternative is needed or whether it should accommodate some prescribed level of development beyond those set forth in the Basic Project Objectives.

The comment asserts that the Phased Build Alternative is not tailored to meet renewable energy goals in excess of the 33 % RPS. The comment recognizes that the Draft EIR/EIS analysis was prepared and released before passage of a higher 50 % RPS in Senate Bill 350 (2015). The comment continues by identifying potential future activities that would create environmental impacts, based on the presumption that future expanded transmission capacity would be needed within the corridor, and the comment requests additional environmental review for those activities.

See General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) for information on the level of potential “future” construction considered to be necessary or foreseeable at this time. The EIS presents substantial evidence demonstrating that the Phased Build Alternative accurately describes the whole of the action proposed under that alternative, including its ability to accommodate and provide transmission capacity for all reasonably foreseeable electricity generation projects. More information regarding the need for additional environmental review of the Phased Build Alternative is discussed in responses to comments made by SCE (Responses to Comments F1-12 and F1-13). See Response to Comment F1-11 in response to concerns on outages during construction of the Phased Build Alternative.

- B9-4 The comment indicates that a greater level of electrical resistive losses would occur with the Phased Build Alternative than would occur with the Proposed Project. The comment also indicates that higher losses may lead to additional environmental effects with the energy necessary to overcome the losses resulting in GHG emissions. The description of the alternative notes that the losses would be higher and that this issue is primarily a cost concern that can be balanced within the overall consideration of lower construction costs achieved with the alternative.

The actual level of resistive losses depends on actual line loading, which would continuously vary, and the potential sources of energy that would need to change dispatch to overcome the losses have not been identified. Because the dispatch would vary, discerning the changes in GHG emissions would require a production simulation modeling effort, which is beyond the scope of the EIR. As with the Proposed Project, the alternative aims to facilitate transmission from renewable energy resources. Although changes in GHG emissions are not quantified, primarily renewable resources contribute to the need for upgrading the corridor (as in Table A-4, Projects Contributing to Need for WOD Upgrade Project), and any potential incremental GHG emissions would be minimized by the low levels of GHG emissions from the upstream electric generation facilities.

The description of the Phased Build Alternative (Section 4.4 in Appendix 5) and the discussion of GHG impacts (in Climate Change, Section D.6.4.3, Phased Build Alternative) have been revised to qualitatively reflect this consideration.

- B9-5 The comment describes technical considerations related to analyzing the need for deliverability. General Response GR-2 notes that the power flow analysis in the EIS does not include a formal study of deliverability. Conducting a comprehensive deliverability study in a manner consistent with the CAISO’s deliverability study methodology is beyond the scope of the EIS, which focuses on a comparative analysis of the Proposed Project and its alternatives and determining whether the alternatives to the Proposed Project are feasible and help avoid or minimize effects of the Proposed Project.

The comment states that levels of generation listed from the interconnection queue in the EIS are incremental to baseline conditions, and a higher level of deliverability should be targeted instead of the minimum level of 2,200 MW. The EIS recognizes that the 2013 West of Devers Interim Project presently provides deliverability to 985 MW of installed renewable generation from projects that have Full Capacity Deliverability Status (FCDS) in the baseline conditions. These baseline projects are included in the various power flow modeling scenarios, including at the level of dispatch modeled with the 2024 Reliability Base Case in Case #3. EIS Section B, Description of the Proposed Project, and the EIS power flow analysis

recognize that the 2013 West of Devers Interim Project (EIS Section B.1.1) would be removed as part of the Proposed Project, and accordingly, it is not part of the modeling of the alternative. See General Response GR-2 for a discussion of the agency-specific Basic Project Objectives.

The 2,200 MW level that appears in Basic Project Objective 1 is from the CAISO's Transition Cluster Generation Interconnection Study from 2010. The power flow analysis provided information on generation levels potentially going beyond the 2,200 MW value for the region. The EIS uses this information to explore the actual development activities of new generation as viewed from contract activity and CAISO generation queue activity (EIS Appendix 5, Attachment 2, pp. 4-7), to demonstrate a basis in finding the Phased Build Alternative to be a potentially feasible alternative.

In defining the 2,200 MW level, the EIS recognizes that previously-queued serial projects as well as existing connected generation would have already been deemed "deliverable", either through the application of generator-specific upgrades, or through the existing available transmission system capacity. The power flow modeling then directly compares the topology of the Phased Build Alternative to the Proposed Project to explore the differences in performance with all other assumptions being equal, within the seven cases or scenarios. As noted by the commenter, the analysis was conducted prior to the availability of Cluster 8 case data; however, while conditions have changed and will continue to change, the EIS accurately recognizes that the interconnection queue changes often. The changing nature of generation planned in the region may ultimately reveal through the CPUC general proceeding that the Phased Build Alternative is infeasible.

The "holistic" and "forward looking" review of information requested by the comment occurs in the CPUC general proceeding. The topic of whether the alternative is feasible is clearly within the scope of the CPUC general proceeding and evidentiary hearing, as described in General Response GR-1.

B9-6

The comment claims that the Draft EIR/EIS inappropriately uses the CAISO 2024 Reliability Base Case in establishing deliverability. The comment points to the generation level tabulated within the power flow analysis from this modeling case and notes that the CAISO adjusts dispatch as necessary in the Reliability Base Case to test the reliability of the system.

The EIS shows that the Reliability Base Case represents 6,901 MW of installed generation capacity across the entire power flow study region, upstream and downstream of the West of Devers corridor, dispatched at 3,754 MW online (Section A.2.3, CPUC and BLM Project Objectives; as detailed in Table A4 of EIS Appendix 5, Attachment 2, p. 21). To model the alternative in a manner consistent with the CAISO cases, the power flow analysis did not adjust any dispatch levels.

The Power Flow Analysis Approach (EIS Appendix 5, Attachment 2, p.7) describes how the Reliability Base Case was used as a means of screening out speculative generation, and the Cluster 7, Phase 1 case was used as a means of testing deliverability. The power flow analysis in the EIS does not include a formal study of deliverability. Conducting a comprehensive deliverability study in a manner consistent with the CAISO's deliverability study methodology is beyond the scope of the EIS, which focuses on determining whether the alternatives are feasible.

The power flow analysis shows the level of dispatch modeled for the Phased Build Alternative in Case #3, which uses the 2024 Reliability Base Case. At Red Bluff and Colorado River Substations, the 2024 Reliability Base Case includes 1,387 MW online, and this is a representation of 3,853 MW of installed renewable resource capacity at these interconnection points, after accounting for dispatch at the 36 percent capacity factor that is set in the Reliability Base Case. Notably, the 3,853 MW of installed capacity in Case #3 is also a level sufficient to accommodate the 3,800 MW Riverside East renewable resource portfolio in the transmission planning process, as transmitted in the March 11, 2015 letter from the CPUC to CAISO (identified by Comment B9-2). The EIS power flow analysis of Case #3 also includes the import of 1,400 MW from Imperial Irrigation District.

Although the EIS need not consider speculative generation, the highest level of dispatch appears within power flow modeling Case #6, which is a worst-case scenario of all foreseeable generation projects (the Cluster 7, Phase I case plus an additional 1,400 MW from the Imperial Valley). This scenario represents generation at a level that would be greater than anticipated, and the conclusion for Case #6 shows that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p. 12).

This topic is also addressed in Response to Comment F1-6 (SCE's cover letter).

B9-7        The comment states that the EIR includes an incorrect assumption by modeling scenarios with 1,400 MW of imports from the Imperial Irrigation District (IID). This assumption was conservatively included in the power flow analysis and evaluated as a sensitivity to determine an upper end of the loading spectrum. The power flow analysis compares the performance of the Proposed Project with the alternative in terms of the electrical loads that occur on the lines, and including the imports from IID shows a conservatively high level of loading. Although utilities presently do not need to plan according to this assumption, retaining this scenario conservatively tests the performance of the Proposed Project and the Phased Build Alternative. Removing this level of import, as suggested by the comment, should indicate a lower level of loading and better levels of performance.

B9-8        The comment states that the Draft EIR/EIS appears to assess "the impacts of the Phased Build Alternative on generation development" in comparison with the Proposed Project. As noted by the comment, the power flow analysis provides a comparative benchmarking of performance of the alternative against the project. However, the comparison in the power flow analysis is not an assessment of "impacts" on generation project development activity. General Response GR-1 addresses the scope of projects contributing to the need for the Proposed Project and connected actions. See also General Response GR-2 on the obligation to consider a range of potentially feasible alternatives that is not unduly limited.

Separate from the power flow analysis, the EIS, in Section B.7.1, Definition of Connected Action Projects, recognizes that some generation projects are so closely related to the Proposed Project as to be considered "connected actions," and the EIS also provides information on the environmental impacts of these, as well as cumulative projects and projects that could fill a remaining growth-inducing capacity (as categorized in Section A.3, Definition of Connected Actions and Related Projects), shown in Section F.1.3, Growth Related to Development of Additional Power Generation Facilities.

The comment also indicates that CAISO intends to conduct a comparative analysis of project alternatives using the CAISO's deliverability study methodology, and CAISO intends to

- present its results in testimony in the CPUC general proceeding (A.13-10-020). As described in previous responses, the EIS does not include a formal study of deliverability. This topic is addressed in more detail in Responses to Comments B9-5 and B9-6.
- B9-9 The comment asserts that the Draft EIR/EIS includes an incorrect implication that the Phased Build Alternative would satisfy power flows associated with the Cluster 7, Phase 1 case in Case #4 (EIS Appendix 5, Attachment 2, p.10-11). However, Case #4 of the power flow analysis relates to the Proposed Project and not the Phased Build Alternative, which is tested in Case #6 with the same level of generation as Case #4 plus the import of 1,400 MW from IID. The conclusion for Case #6 shows that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p.12).
- B9-10 The comment requests that the EIS include information on the potential need to re-string the conductors in the Phased Build Alternative as such future work could result in additional environmental impacts.
- The Phased Build Alternative includes ability to allow for future capacity expansion through future reconductoring, if needed (EIS Appendix 5, p.Ap.5-46), but the need for such future work is not yet foreseeable. See General Response GR-4 on the need for “future phases” of construction under the Phased Build Alternative and Response to Comment F1-13.
- The comment notes that de-energizing circuits for an outage could be necessary during construction and that this could create a change in dispatch, should it occur as necessary to accommodate outages. This comment is similar to a comment from SCE (Comment F1-11) that construction of the Phased Build Alternative would result in the potential for outages that could influence generator dispatch, or generator curtailment and the associated economic loss. The comment indicates that a greater level of curtailment of renewable generation could occur with the Phased Build Alternative during outages than would occur with the Proposed Project. The potential market impacts of such outages would be economic impacts beyond the scope of the EIS analysis. Determining the potential environmental effects of changing dispatch or curtailment patterns would also be beyond the scope of EIS analysis and speculative. Additional and updated information on the topic of upgrading the corridor after the implementation of the Phased Build Alternative appears in General Response GR-4.
- B9-11 The comment indicates that a greater level of electrical losses would occur with the Phased Build Alternative than would occur with the Proposed Project. See Response to Comment B9-4 for a discussion of the higher resistive losses related to the Phased Build Alternative.
- B9-12 The comment indicates closing remarks for EIR/EIS comments and the intent to present testimony in the CPUC general proceeding for this project (A.13-10-020). No further response is required as the comment does not raise any new or significant environmental issues.
- B9-13 The comment includes a copy of the May 2010 MOU between CAISO and CPUC on the Revised ISO Transmission Planning Process. The Proposed Project predates the first implementation of the Revised ISO Transmission Planning Process because it was identified earlier by CAISO in 2010 as a required Delivery Network Upgrade for specific LGIA's. General Response GR-3 provides a review of the Transmission Planning Process and its relationship to the environmental review for this project-level request for a CPCN.

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Comment Set C1 – Morongo Band of Mission Indians

MORONGO  
BAND OF  
MISSION  
INDIANS



September 22, 2015

VIA E-MAIL ([westofdevers@aspnec.com](mailto:westofdevers@aspnec.com)) and U.S. Mail

CPUC/BLM  
c/o Aspen Environmental  
235 Montgomery Street, Suite 935  
San Francisco, CA 94014

Re: Morongo Band of Mission Indians Comments on the Draft Environmental Impact Report for the SCE West of Devers Upgrade Project

C1-1

The Morongo Band of Mission Indians (Morongo Band) appreciates the opportunity to comment on the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) for the Southern California Edison (SCE) West of Devers Upgrade Project (Project). The Morongo Band's comments are limited to correcting an error in the DEIR/DEIS concerning the legal feasibility of the Phased Alternative.

The DEIR/DEIS, Appendix 5, Alternative Screening Report, states at Ap. 5-54:

Legal and Regulatory Feasibility. The Phased Build Alternative appears to be feasible considering legal and regulatory factors. The Proposed Project has been approved by the Morongo Tribe in a ROW Agreement with SCE (see EIR/EIS Appendix 3), and there is no language in the Agreement that conflicts with the components of this alternative.

The statement that there is no language in the Agreement that conflicts with the components of this alternative is incorrect. The Morongo Band included provisions in its Agreement with SCE that reserve the Morongo Bands right to cause the United States Department of the Interior to terminate SCE's rights of way across the Morongo Reservation -- including those for the Project (ROW) -- if by January 1, 2017, SCE has not obtained all required regulatory approvals for the Project as presented by SCE to the Morongo Band. These same rights to terminate SCE's ROW are included in each of the Department of the Interior's grants to SCE of Easements and Rights of Way across the Morongo Indian Reservation for both SCE's existing facilities and the Project.

The Phased Build Alternative is materially different than the Project as presented by SCE to and accepted by the Morongo Band. Therefore, the Morongo Band could conclude that approval of the Phased Build Alternative, rather than the Project as described in Exhibit A to the DCA, does not satisfy SCE's obligation under the Agreement and the federal grants of easements and rights of way to obtain the required

Comment Set C1 – Morongo Band of Mission Indians (cont.)

CPUC/BLM

September 22, 2015

Page 2

regulatory approvals by January 1, 2017, and the Morongo Band could exercise its right to direct the Department of the Interior to terminate the ROW, which would affect not

only SCE's proposed Project, but also the continued presence on the Morongo Reservation of SCE's existing 220 kV and 115 kV transmission facilities.

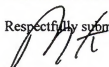
C1-1  
cont.

The DEIR/DEIS should be revised to reflect the possibility that if the Morongo Band were to conclude that the Proposed Phased Build Alternative does not satisfy SCE's obligation to timely obtain all required regulatory approvals of the Project as described in Exhibit A to the DCA, the Morongo Band could direct the Department of the Interior to cancel the ROW, in which event there would be a legal impediment to the Project.

C1-2

The Morongo Band appreciates the Commission's careful and expeditious consideration of this matter.

Respectfully submitted,



Robert Martin

Chairman

Morongo Band of Mission Indians



## Responses to Comment Set C1 – Morongo Band of Mission Indians

**C1-1** The comment refers to provisions in the Morongo Band's ROW Agreement with SCE and states that it seeks to correct an alleged error in the Draft EIR/EIS concerning the legal feasibility of the Phased Build Alternative. The commenter makes two statements that are addressed in this response; each is addressed below.

**Comment (a)** The Morongo Band included a provision in its ROW Agreement with SCE that reserves the Morongo Band's right to cause the United States Department of the Interior to terminate SCE's rights of way across the United Reservation – including those for the Project (ROW) – if by January 1, 2017, SCE has not obtained all required regulatory approvals for the Project as presented by SCE to the Morongo Band.

**Response to (a):** It appears that the comment is referring to the "Additional Morongo Termination Right" as described in Section V.D. of the ROW Agreement, which details the Morongo Band's conditional contract right to terminate its ROW Agreement with and seek the termination of the Federal Grant of ROW to SCE. The conditional contractual right is duly noted and acknowledged. Selection of the Phased Build Alternative would not reduce the likelihood that SCE could obtain all required regulatory approvals by January 1, 2017, as compared with SCE's Proposed Project. Except on Morongo land, this alternative would require substantially less construction because the existing double-circuit towers would remain in place.

**Comment (b)** The Phased Build Alternative is materially different than the Project as presented by SCE and accepted by the Morongo Band.

**Response to (b):** The comment does not describe "the Project as presented by SCE to and accepted by the Morongo Band," but this response assumes that the comment is referring to the WOD Upgrade Project SCE proposed in its application for a Certification of Public Necessity and Convenience ("CPCN") and that is very generally described as the "Project" in Exhibit A to the Development and Coordination Agreement ("DCA"), attached as Appendix J-3 to the ROW Agreement; also presented is Appendix 3 to the EIS.

While the Phased Build Alternative does not completely replicate SCE's Proposed Project off the Reservation, the Phased Build Alternative was developed specifically to match precisely both the Proposed Project's specific locations and structure types on Morongo lands. As defined in the Alternatives Screening Report (Appendix 5, Section 4.4; see excerpt below), on Morongo lands, the Phased Build Alternative would be located in the specific locations and using the tower types defined for the Proposed Project and generally consists of the tear down and rebuild of the four existing 220 kV transmission lines with new 220 kV transmission lines that cross the Reservation. The comment neither addresses these inconsistencies nor explains specifically why it is believed that the Phased Build Alternative is materially different than the Project. In addition, while the ROW Agreement provides that the Morongo Band possesses a termination right if the defined project does not receive permits and approvals by January 1, 2017, the Morongo Band has not indicated that it would indeed elect to terminate the ROW Agreement if a project alternative were selected by the CPUC, particularly an alternative whose footprint and components on the reservation is identical to that of the defined project.

Please note the following description of the Phased Build Alternative (EIS Appendix 5, page Ap.5-47):

Segment 5 (including all Morongo Land) would be configured as follows:

- In the westernmost 3 miles of tribal land, all transmission facilities in the existing ROW would be removed and relocated south to new ROW closer to I-10.
- In this westernmost segment, 19 pairs of new double-circuit tubular steel poles would be installed and the high-capacity conductors (795 Drake ACCR) would be installed on the new poles.
- On the eastern portion of the Morongo land, 30 pairs of new double-circuit lattice steel towers would replace the existing single-circuit towers; high capacity conductors (795 Drake ACCR) would be installed on these new towers.

Therefore, the alternative appears consistent with the Project (both as proposed by SCE and defined in Exhibit A to the DCA) that would be constructed on Morongo land should the Phased Build Alternative be approved.

C1-2

The comment requests revision of the EIS to reflect that if the Morongo Band were to conclude that the Phased Build Alternative does not satisfy SCE's obligation to timely obtain all required regulatory approvals of the Proposed Project, the Morongo Band could direct the U.S. Department of Interior to cancel the ROW, which would create a legal impediment to this project alternative.

The discussion of the feasibility of the Phased Build Alternative in Section 4.4 of the Alternatives Screening Report has been modified as shown below. Similar text has been modified in EIS Section 3 (Alternatives) and in the Executive Summary (Section ES.3.2).

#### *Feasibility*

Legal and Regulatory Feasibility. While the Morongo Band has a conditional contractual right to terminate its ROW Agreement with SCE, the Phased Build Alternative appears to be preliminarily feasible considering legal and regulatory factors, because it is currently uncertain whether the Morongo Band may or will exercise that right, and particularly because on Morongo lands the alternative is entirely consistent with the Project (as defined in Exhibit A to the DCA). Although the alternative is designed to meet the same project objectives as the Project described in the ROW Agreement and DCA and the tower structures would be exactly the same as SCE's Proposed Project on Reservation lands, comments from the Morongo Band assert that this alternative may be legally infeasible given the right of the Morongo Band to terminate the ROW Agreement if the SCE does not secure approvals by January 1, 2017 for the project described in the DCA (which arguably differs from the Phased Build Alternative in the tower locations off the Morongo Band lands, but is wholly consistent on Morongo Band lands). That termination right, however, has not been exercised and thus no such legal infeasibility currently exists. If that right is properly and timely exercised by the Morongo Band in the future, no transmission upgrades could be constructed across the Reservation absent the subsequent execution of a replacement ROW Agreement.

In summary, the CPUC and BLM are aware of the Morongo Band's conditional contractual right to terminate the ROW agreement and seek the termination of the Federal Grant. However, based on the information and evidence currently before the CPUC and BLM, the Phased Build Alternative continues to appear preliminarily feasible.

Comment Set C2 – Colorado River Indian Tribes



## COLORADO RIVER INDIAN TRIBES

### *Colorado River Indian Reservation*

26600 MOHAVE ROAD  
PARKER, ARIZONA 85344  
TELEPHONE (928) 669-1220  
FAX (928) 669-1216

September 22, 2015

*Via Email and Facsimile*

California Public Utilities Commission/U.S. Bureau of Land Management  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104  
Fax: (888) 456-0254  
Email: [westofdevers@aspeng.com](mailto:westofdevers@aspeng.com)

**Rc: Comments of the Colorado River Indian Tribes on the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for Southern California Edison Company's (SCE) Proposed West of Devers Upgrade Project**

To Whom It May Concern,

The Colorado River Indian Tribes (Tribes) writes to express its concerns regarding the Proposed West of Devers Upgrade Project (Project) and the accompanying Draft EIR/EIS. The Colorado River Indian Tribes is a federally recognized Indian tribe comprised of over 4,200 members belonging to the Mohave, Chemehuevi, Hopi, and Navajo tribes. The approximately 300,000-acre Colorado River Indian Reservation sits astride the Colorado River between Blythe, California and Parker, Arizona. The ancestral homelands of the Colorado River Indian Tribes' members, however, extend far beyond the Reservation boundaries. Significant portions of public and private lands in California, Arizona, and Nevada were occupied by the ancestors of the Colorado River Indian Tribes' Mohave and Chemehuevi members since time immemorial. Because of this, the Tribes are very concerned with preserving the footprint of these Mohave and Chemehuevi ancestors for future generations of tribal members.

The Colorado River Indian Tribes has a direct interest in the infrastructure and development of utility-scale renewable energy projects in this region, including transmission lines. The Tribes have not forgotten the devastating effects of the Palo Verde-Devers II Transmission Project, where construction workers unearthed previously unknown burial sites and damaged a known, well-documented rock circle site. With these concerns in mind, the Tribes reviewed the Draft EIR/EIS and now provide a number of comments:

C2-1

Comment Set C2 – Colorado River Indian Tribes (cont.)

Inconsistent Treatment of “Connected Actions”

- The Tribes appreciate the DEIR/EIS’s acknowledgement of “connected actions” under NEPA – actions that “cannot or will not proceed unless the proposed action occurs first or simultaneously.” 40 C.F.R. § 1508.25(a)(1)(ii). Yet, the Tribes have concerns about the inconsistent treatment of these connected actions throughout the DEIR/EIS. For instance, the Executive Summary identifies only the Palen Solar Electric Generating System, the Desert Harvest Solar PV Project, and five unnamed solar PV projects as connected actions. DEIR/EIS at ES-5. This list of connected actions is the same for the Project Description. *Id.* at B-66 to B-70. Later, however, the cultural resources section of the DEIR/EIS identifies the Desert Harvest Project and the Blythe Mesa Solar Project (as representative of the unnamed solar PV projects) as connected actions, but makes no mention of the Palen Project. *Id.* at D.7-19 to 7-21. The DEIR/EIS provides no explanation as to the variations between the list of connected actions in different parts of the analysis. The DEIR/EIS should be revised to provide a consistent treatment and analysis of all connected actions across its entire analysis. Also, to the extent the agencies are in receipt of responsive information, the Colorado River Indian Tribes requests disclosure on the “confidential projects” referenced in the DEIR/EIS Project Description at B-67.
- The DEIR/EIS’s failure to consider the Palen Solar Electric Generating System in the cultural resources analysis is especially egregious in light of the well-documented cultural resource concerns surrounding the Palen Project. *See, e.g.*, California Energy Commission, Dkt. No. 09-AFC-07C, TN # 202933 (Intervenor Colorado River Indian Tribes Opening Brief, Aug. 15, 2014); TN# 200564 (Final Staff Assessment, 4.3-1 to -244). In its current form, the DEIR/EIS analysis provides an inaccurate and inadequate representation of all cultural resource impacts that will result from the proposed Project. The DEIR/EIS should be revised to consider the direct, indirect, and cumulative cultural resource impacts of the Palen Project as a connected action that cannot or will not proceed unless the proposed transmission upgrade occurs.
- The DEIR/EIS also needs to be revised to provide an accurate and updated description of the Palen Project. The Project Description characterizes the Palen Project as a 500 megawatt solar power tower, but Palen SEGs I, LLC (the Palen Project owner) recently clarified that it will be pursuing the original solar trough technology: “the Project Owner has determined that a solar trough project, similar to that approved in the original application for certification, will be pursued for this site, and design will include energy storage.” California Energy Commission, Dkt. No. 09-AFC-07C, TN # 205854 (Response Letter to Comments on Petition, Aug. 27, 2015). Thus, the DEIR/EIS must be further revised to analyze the Palen Project connected action as a solar photovoltaic project, rather than a solar power tower. This revised analysis is especially important when considering potential cultural resource impacts, as a solar trough project would involve far more grading than a solar power tower and could have more direct impacts on buried resources.

C2-1  
cont.

C2-2

Comment Set C2 – Colorado River Indian Tribes (cont.)

Alternatives

- While the Tribes would prefer the curtailment of desert development and utility-scale renewable energy siting in its ancestral lands, if this Project is approved, we urge BLM and the CPUC to adopt the phased build alternative, which will result in the least construction and the fewest ground disturbing actions, thereby reducing the risk of unearthing and/or harming unknown cultural resources.

C2-3

Mitigation Measures

- APM CUL-1 (CL-1b) should be revised to allow for in-situ reburial as a mitigation measure for prehistoric resources where avoidance is not feasible. Removal of artifacts from the ground is contrary to Mohave cultural and religious practices. The use of data recovery and excavation to “mitigate” impacts undermines the Colorado River Indian Tribes’ efforts to preserve the Mohave and Chemehuevi footprint on our ancestral lands. The Tribes have experienced the tragic consequences of BLM’s anti-reburial policy in connection with utility-scale solar energy development along the I-10 corridor near Blythe, California. Items such as manos, metates, flakes, cores, and hammerstones are closely associated with the people who used them and are part of the footprint of the land. These artifacts cannot be removed from the ground without causing irreparable spiritual and cultural harm to our people. For this reason, the DEIR/EIS should be revised to state that where avoidance is not feasible, in-situ reburial will be the preferred mitigation measure.
- The DEIR/EIS dismisses isolated artifacts from consideration early in its cultural resource analysis, explaining that “by definition, [isolated artifacts] lack immediate cultural context and therefore lack the data potential that would be required to be considered eligible for the NRHP or CRHR.” *Id.* at D.7-32. This cursory analysis fails to take into account the cultural importance that prehistoric isolated artifacts may have for tribal groups. The Colorado River Indian Tribes view the removal and/or destruction of *any* prehistoric artifacts, including isolates, as eroding their cultural identity and connection with their ancestors. The DEIR/EIS should be revised to allow for reburial of all prehistoric isolated artifacts, as BLM has done for isolates unearthed during construction of the Modified Blythe Solar Power Project and Riverside County has done for isolates discovered during construction of the Blythe Mesa Solar Power Project.
- The DEIR/EIS acknowledges the possibility of indirect impacts from “inadvertent or malicious vandalism or unauthorized collection of cultural resources on the surface of sites,” but fails to address the possibility of indirect impacts from fugitive dust or increased travel to construction sites. *Id.* at D.7-33. In light of the damage that occurred during the Palo Verde-Devers II Transmission Project, the DEIR/EIS should be revised to consider these types of indirect impacts.
- CL-1b should be revised to state that SCE will consult with affiliated Native American tribes in drafting the CRMP. CL-1b should be further revised to state that the CRMP will be submitted to affiliated Native American tribes for comment and review prior to its submission to the CPUC and BLM for review and approval. Lastly, CL-b should be

C2-4

C2-5

C2-6

C2-7

**Comment Set C2 – Colorado River Indian Tribes (cont.)**

revised to state that the CRMP approval process must be *finalized* at least 60 days prior to the start of *ground-disturbing* activities. *See* D.7-43.

C2-7  
cont.

- CL-1b and CL-1d should be revised to allow for archaeological monitoring during all ground-disturbing activities, not just construction in identified high-sensitivity areas. *Id.* at D.7-34, 7-44. The constant presence of archaeological monitors is necessary as it is impossible to know when construction efforts will encounter unknown, buried cultural resources; indeed, the presence of monitors can help ensure proper response and treatment. Moreover, CL-1b should be revised to clarify that archaeological monitoring includes the presence of a tribal monitor to ensure proper identification and treatment of discovered resources.

CL-2a should be revised to state that upon discovery of an unidentified cultural resource unearthed during construction activities, SCE will immediately notify affiliated Native American tribes and invite them to consult in assessing the potential significance of the resource and crafting an appropriate evaluation and treatment plan for the find. *See* D.7-45.

C2-8

**Socioeconomic and Environmental Justice Impacts**

- The DEIR/EIS utilizes a 0.5 mile radius outside the ROW to identify low income or minority populations, but this method only considers current census data and sociopolitical boundaries –thereby overlooking the relationships that modern day tribes have to their ancestral territories. As explained above, the Colorado River Indian Tribes have deep spiritual and cultural connections to lands far beyond the political boundaries of their reservation. In looking only at where local populations currently live and considering only socioeconomic census data, the DEIR/EIS ignores the damaging effects of the Project and its connected actions on the traditional cultural heritage of area tribes.
- Indeed, the transformation of an entire cultural landscape has significant environmental justice implications that are not addressed by the DEIR/EIS. The DEIR/EIS's Socioeconomic and Environmental Justice section completely ignores Native American environmental justice impacts. This is unacceptable. The benefits of the connected action renewable energy projects made possible by the Project will flow to energy customers in southern California and the shareholders of large energy companies. The impacts of such projects, however, will be uniquely felt by the Colorado River Indian Tribes and its members whose interests in this area extend beyond economics to its cultural and spiritual value. As acknowledged by CEC Commissioner Karen Douglas in another proceeding, “Indian tribes maintain long-standing ancestral and traditional practices that connect their identities as Indian people to the environment, unlike other populations that do not have territories linked to their collective identities.” Palen Solar Electric Generating System PMPD at 6.3057. Shifting the burden of renewable energy development to unique communities that have occupied this landscape since time immemorial, while providing such communities with no identified benefits, is the very definition of environmental injustice. The DEIR/EIS agencies must both recognize and address such realities, in terms of direct, indirect, and cumulative impacts.

C2-9



Comment Set C2 – Colorado River Indian Tribes (cont.)

Visual Impacts

- The DEIR/EIS fails to acknowledge the visual resource impacts of the Project's connected actions on sacred and traditional landscapes. The integrity of certain desert viewsheds plays a key role in various tribal ceremonies and rituals. As ethnographer Lowell John Bean explained when analyzing the impact of utility-scale solar energy development:

"These [song trail] sites are still connected to people today through oral history and some through contemporary use [of] known sacred areas and the plant and animal life that continues as it has for thousands of years. The loss of these lands and resources to the energy fields and transmission lines is incalculable from the standpoint of people whose roots are so deeply entwined with its openness and integrity." Ethnographic Overview of the Historic Trails Network Cultural Landscape, Genesis Solar Energy Project, Historic Properties Treatment Plan, Appx. H-8.

The Project, as well as the connected actions it facilitates, could significantly undermine the "openness" of sacred viewsheds. The DEIR/EIS visual resources analysis should be revised to consider that potential impact.

Cumulative Impacts

- The DEIR/EIS should be revised to provide more updated and accurate information about the actions listed on the Cumulative Project List, Table E-1. For instance, the List states that the "McCoy [Solar Project] is approved by BLM but construction has not started," but construction of the McCoy Project has been taking place throughout 2015. Table E-1 should be revised to give a more exact representation of these projects and their current status.
- The DEIR/EIS cumulative impacts analysis should also be revised to give the public a clearer sense of how the connection actions are analyzed in this section. None of the connected actions appear on the Cumulative Project List in Table E-1, but the DEIR/EIS also makes no mention of the connected actions in its analysis of the Project's cumulative impacts. Given that the connected actions have the potential to cause significant impacts, especially on cultural resources, they must be included in the DEIR/EIS's analysis in order to provide the public with an accurate understanding of the Project's cumulative effects.
- The Tribes strongly disagree with the DEIR/EIS's significance finding for cumulative cultural resource impacts. Given the DEIR/EIS's determination that buried cultural resource impacts cannot be fully mitigated, an action like the Project that encourages and facilitates the development of this desert region will have a significant cumulative impact on those buried cultural resources. Here, BLM and CPUC's conclusion appears to result from their failure to consider the Project and its connected actions. The DEIR/EIS cumulative impacts analysis should be revised accordingly.

C2-10

C2-11

C2-12

C2-13

**Comment Set C2 – Colorado River Indian Tribes (cont.)**

Thank you for the opportunity to comment on the DEIS EIR for the Proposed West of Devers Upgrade Project. To help facilitate the Tribes' review of BLM and CPUC's response to these comments, we request that these agencies provide a written response to this letter, either directly or in the Final EIS EIR. Please copy the Colorado River Indian Tribes Office of the Attorney General on any further correspondence to help facilitate our internal review (Rebecca Loudbear, Attorney General, [rloudbear@critdoj.com](mailto:rloudbear@critdoj.com) and Naney Jaseulea, Deputy Attorney General, [njaseulea@critdoj.com](mailto:njaseulea@critdoj.com)). Finally, the Colorado River Indian Tribes welcomes the opportunity to meet with representatives on behalf of the CPUC, and renews its request to meet with the California BLM State Director, Jim Kenna, to discuss substantive issues related to tribal consultation and adverse impacts of utility-scale renewable energy projects on cultural resources.

C2-13  
cont.

Sincerely,



Chairman Dennis Patch  
Colorado River Indian Tribes

CC: Tribal Council of the Colorado River Indian Tribes  
Wilene Fisher-Holt, Director, Colorado River Indian Tribes Museum  
David Harper, Chairman/Spokesperson, Mohave Elders Committee



## Responses to Comment Set C2 – Colorado River Indian Tribes

- C2-1 The commenter notes that the Colorado River Indian Tribes, whose ancestors occupied much of the Colorado Desert, have a direct interest in the infrastructure and development of utility-scale renewable energy projects in the region, including transmission lines. The commenter is concerned about the consistency of the projects identified as connected actions throughout the Draft EIR/EIS. Specifically, the commenter states that the cultural resource section identifies the Desert Harvest Project and the Blythe Mesa Solar Project, but makes no mention of the Palen Solar Power Project in the analysis of connected actions. Thus, the commenter is concerned that the cultural resource connected actions analysis failed to consider the Palen Solar Power Project and therefore is an inaccurate and inadequate representation of all cultural resource impacts that will result from the proposed Project.
- To clarify, background context for the cultural resource analysis (Section D.7.1.3) was summarized from the Desert Harvest Project and the Blythe Mesa Solar Project. As described in Section B.7.2 (Description of the Proposed Project, Descriptions of Connected Actions), because the confidential projects do not yet have environmental review documents, the Blythe Mesa Solar Project EIR/EA was used as a model for impacts as it is a solar PV project in similar nearby areas and habitats and would connect to the same substation as the confidential projects. However, when discussing Known Resources within the Desert Center Area (Section D.7.1.3), specific cultural resource information from both the Desert Harvest Project and the Palen Solar Power Project was used, thus portraying the cultural resource sensitivity of the area. In addition, cultural resource information from the Palen Solar Power Project was used for the cultural resource connected actions analysis in Section D.7.3.4 (Impacts of Connected Actions). Therefore, no change has been made to the text in Sections D.7.1.3, D.7.3.4, and D.7.3.5.
- C2-2 This comment requests an updated description of the Palen Solar Project including an update to the analysis of the connected actions reflecting the new technology for the project.
- Please see Response to Comment B4-7. Section A (Introduction), Table A-4 (Projects Contributing to Need for WOD Upgrade Project) has been updated to reflect the Energy Commission's extension of time to construct. The Palen Project would not be a solar photovoltaic project as mentioned in the comment, it would be amended to be a solar trough project as noted in the Energy Commission Order Granting Extension of Time to Construct (TN#:206118). Section B.7 (Description of the Proposed Project, Connected Actions), including Table B-22 (Connected Actions – Solar Generation Projects) and Section B.7.2.1 (Description of the Proposed Project, Known Projects) and the analysis of the Connected Actions throughout Section D have been updated to reflect the revised status of the Palen Solar Project.
- C2-3 The commenter urges adoption of the Phased Build Alternative because of less ground disturbance, reducing the risk of unearthing or harming unknown cultural resources.
- The commenter's support for the Phased Build Alternative is noted.
- C2-4 The commenter requests that "APM CUL-1 should be revised to allow for in-situ reburial as a mitigation measure for prehistoric resources where avoidance is not feasible" and cites BLM policies with regard to reburial.

SCE's APM CUL-1 provides for the avoidance, minimization, and mitigation of cultural resource impacts. It also provides that for traditional cultural property SCE will consult with Native American stakeholders on effects and will negotiate mutually agreeable treatment. In-situ reburial could be one such treatment where authority exists to do this. It should be noted that only a small portion of the proposed Project crosses BLM-administered lands. The majority of the Proposed Project is located on private land, over which the BLM has no authority. Artifacts recovered from private lands during the course of a project remain the property of the landowner. The disposition of those artifacts is at the sole discretion of the landowner, with the exception of human remains, associated grave goods, and items of cultural patrimony. In the event that such remains are found on private land during project construction or operation, and cannot be avoided, provisions of the Public Resources Codes 5097.98 and the Health and Safety Code 7050.5 will be enforced.

In the event that human remains, associated grave goods, or items of cultural patrimony are discovered on the small portion of this project located on federal lands administered by the BLM, and cannot be protected, it is assumed that the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA; 43 CFR 10) will be enforced by implementing a NAGPRA Plan that will be developed as part of the Memorandum of Agreement under Section 106 (36 CFR 800) of the National Historic Preservation Act (54 U.S.C. 4321 et seq.) in BLM's consultation with interested tribes. It is assumed that other prehistoric and historic artifacts from BLM land will be curated in accordance with National Park Service guidelines (36 CFR 79).

Mitigation Measure CL-1b (Develop Cultural Resource Management Plan [CRMP]) also requires preparation and approval of a CRMP to guide all cultural resource management activities during construction.

- C2-5 The commenter is concerned that "the DEIR/DEIS dismisses isolated artifacts from consideration early in its cultural resource analysis" and the commenter notes that "the DEIR/DIES should be revised to allow for reburial of all prehistoric isolated artifact."

While it is recognized that isolated artifacts have cultural importance to the commenter, analysis of isolated artifacts is required to be conducted in accordance with the guidelines set forth in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR). These guidelines note that in order to be considered eligible for the NRHP/CRHR, resources must have integrity and association, or be of exceptional significance. The inability to make associations between isolated finds and nearby cultural deposits diminishes their ability to contribute to the archaeological record and the history of the region. Therefore, isolated finds do not meet the eligibility guidelines for NRHP or CRHR listing. As detailed in the Response to Comment C2-4, disposition of isolated artifacts discovered on private property will be at the sole discretion of the landowner, while the BLM will curate isolated artifacts from federally administered land in accordance with 36 CFR 79 guidelines. No change was made to the text in Section D.7.3.3 (Cultural Resources, Impacts and Mitigation Measures).

- C2-6 The commenter states that fugitive dust and increased travel to construction sites should be considered as indirect impacts to cultural resources.

Mitigation Measures AQ-1a (Control fugitive dust) and AQ-1c (Control helicopter emissions) in Section D.3.3.3 (Air Quality, Impacts and Mitigation) address the control and prevention

of fugitive dust. The commenter did not specify the nature of indirect impacts from fugitive dust, but these mitigation measures would reduce fugitive dust and, therefore, reduce the chance for indirect impacts.

The Proposed Project would use existing roads or, if needed, new access roads within an existing ROW with existing transmission structures. Although the use of these roads during construction is not likely expected to increase indirect impacts to cultural resources, the CPUC and BLM agree that increased travel to construction sites is a potential indirect impact to cultural resources and have modified appropriate sections of the EIR accordingly. See Impact CL-1 (Construction, operation, and maintenance, and restoration could cause an adverse change to known historic properties) in Sections D.7.3.3, D.7.3.5, and D.7.4.3.

C2-7

The commenter requests Mitigation Measure CL-1b be revised to state that SCE will consult with affiliated Native American tribes in drafting the Cultural Resources Management Plan (CRMP), that the CRMP will be submitted to affiliated Native American tribes for comment and review prior to submission to the CPUC and BLM for review and approval, that the CRMP will be finalized at least 60 days prior to ground-disturbing activities, and that there will be an archaeological and tribal monitor present during all ground-disturbing activities, not just construction in high-sensitivity areas. The commenter also requests revisions to Mitigation Measure CL-1b and CL-1d to allow for archaeological monitoring during all ground-disturbing activities, not just in areas identified as having high-sensitivity, and that Mitigation Measure CL-1d include provision for a tribal monitor.

To clarify, in Section D.7.3.3, Mitigation Measure CL-1b (Develop Cultural Resource Management Plan) notes that "Mitigation and treatment plans for unanticipated discoveries shall be reviewed by appropriate Native Americans and approved by the BLM, CPUC, and the California Office of Historic Preservation (OHP) prior to implementation." Mitigation Measure CL-1b assures that a CRMP will be prepared for the proposed Project. The CRMP is being developed as part of the Memorandum of Agreement (MOA) under Section 106 to enforce appropriate measures, including archaeological and Native American monitoring, to ensure protection of sensitive resources and areas. Specific locations of monitoring will be developed during government-to-government consultation with appropriate Native Americans, the BLM, and the CPUC and will be formalized within the CRMP as part of the MOA. No change were made to Mitigation Measures CL-1b and CL-1.

C2-8

The commenter requests Mitigation Measure CL-2a be revised to state that upon discovery of an unidentified cultural resource unearthed during construction activities, SCE will immediately notify affiliated Native American tribes and invite them to consult in assessing the potential significance of the resource and crafting an appropriate evaluation and treatment plan for the find.

Procedures for treatment of unanticipated discoveries are described in Mitigation Measure CL-1b (Develop Cultural Resource Management Plan). As noted in Mitigation Measure CL-1b, a CRMP will be prepared for the proposed Project. The CRMP is being developed as part of the MOA under Section 106 to ensure appropriate evaluation and treatment of any resources discovered during construction. Details of specific treatments and protocols for consulting the tribes and other agencies are being developed in the CRMP, in consultation with appropriate Native Americans, the BLM, and the CPUC. Therefore, no change was made to Mitigation Measure CL-2a.

- C2-9 The commenter believes the socioeconomic and environmental justice impacts of the project are overlooked by considering only current census data and sociopolitical boundaries and the Draft EIR/EIS ignores the effects of the project and connected actions on traditional cultural heritage areas of tribes. The commenter also feels the Socioeconomic and Environmental Justice section of the document ignores Native American environmental justice impacts by not considering the cultural and spiritual values of the landscape to tribes. The commenter feels this must be addressed in terms of direct, indirect, and cumulative impacts.

Cultural landscapes are evaluated under the National Historic Preservation Act as are other cultural resources and may be found eligible as Traditional Cultural Properties. Traditional Cultural Properties were addressed in Section D.7 (Cultural Resources); none were identified in the area of the Proposed Project, which would upgrade facilities in an existing previously disturbed ROW. In the EIS, Connected Actions are identified. These are future renewable energy projects that would make use of the transmission capacity of the project if built, but are not part of the project itself. These separate actions would be evaluated and approved independent of the Proposed Project. Section D.7.3.4 (Impacts of Connected Actions) discloses that for connected actions, unidentified cultural resources could be located where the connected actions would be occur.

The topic of Traditional Cultural Properties is addressed in Section 106 consultation. The Environmental Justice analysis in Section D.8 complies with Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations). It focusses attention on the environmental and human health effects of federal actions on minority and low-income populations, to determine if there are adverse impacts and, if so, whether they would disproportionately affect covered populations as compared to other affected population groups.

- C2-10 The commenter asserts that the Draft EIR/EIS does not adequately acknowledge the visual resource impacts of the Proposed Project or connected actions on sacred and traditional landscapes. The commenter states that the project and "connected actions it facilitates" would significantly undermine the "openness" of sacred viewsheds and requests that additional analysis be provided.

As discussed throughout Section D.18.3.3 (Visual Resources, Impacts and Mitigation Measures), along most project segments the Proposed Project would be replacing two existing transmission lines with one transmission line within an existing utility right-of-way, thereby reducing the number of structures and the industrial appearance within the right-of-way. The vast majority of the resulting visual impacts identified in this section would either be Beneficial (Class IV) or Adverse but Less Than Significant (Class III). Therefore, visual resource impacts of the proposed Project have been adequately acknowledged, and no additional analysis is required.

Construction and operation of the solar projects comprising the Connected Actions in the Desert Center and Blythe areas do, however, have the potential to adversely impact sacred and traditional landscapes as noted in Section D.18.3.4 (Visual Resources, Impact of Connected Actions) where it is stated that the characteristics of the solar projects (Connected Actions) would noticeably contrast with the predominantly natural appearance of the northern Chuckwalla Valley landscape (Desert Center area) and eastern Chuckwalla Valley and Palo Verde Mesa landscape (Blythe area), as well as the background mountains that define

these valleys. As further noted in the Section D.18.3.4 discussion, the resulting overall visual impacts would typically be substantial.

As for the visual impacts on specific viewsheds (e.g., song trail sites), impact determinations would need to be made on a case-by-case (project-by-project) basis and would depend on specific project location and viewshed and location of sacred and traditional landscapes and sensitive resources of concern. While this level of analysis would typically be accomplished at the individual project level, it is reasonable to conclude that in instances where the projects would be prominently visible from sensitive landscapes, the resulting visual impacts would typically be substantial, as noted in Section D.18.3.4 (Visual Resources, Impact of Connected Actions).

C2-11 The commenter requests that the EIS update Table E-1 (West of Devers Upgrade Cumulative Project List). The environmental setting for an EIS is generally the environmental conditions as they exist at the time the notice of preparation (NOP) is published (14 Cal Code Regs §15125(a)). While the cumulative projects may have changed during preparation of the environmental document, they would not normally be continually updated. However, under NEPA, the baseline can be updated if resources have changed such that this is appropriate. Because a basic objective of the Proposed Project is to support achievement of State and federal renewable energy goals and a number of projects are driving the need for SCE to construct the Proposed Project, the renewable energy projects presented in Section E.2 (Cumulative Projects) and Table E-1 have been updated for the public's information.

C2-12 The commenter states that the cumulative impacts analysis should be revised to provide a clearer sense of how the connected actions are analyzed as they do not appear on the Cumulative Project List (Table E-1) nor are they mentioned in the analysis. The commenter notes that the connected actions have the potential to cause significant impacts especially on cultural resources.

The connected actions were not included in the cumulative list of projects because they were considered in detail in Section D, Environmental Analysis, to provide the public with an understanding of the Proposed Project's total effects. Within each discipline's analysis in Sections D.2 through D.21, the EIS includes both a description of the environmental setting for the connected actions and analysis of the impacts of these actions. Section D.7.3.4 (Cultural Resources: Impacts of Connected Actions) has been revised to include additional details of the known connected action projects to provide the public with a clearer understanding of the total effects of the Proposed Project, as requested by the comment.

The commenter is correct in that including more cumulative projects in Table E-1 would increase the overall number of resources cumulatively affected, but it would not change the overall significance of the cumulative effects nor the contribution of the Proposed Project to cumulative impacts. Instead, having more cumulative projects would reduce the contribution of each individual project. The cumulative analysis for cultural resources already notes that there would be adverse effects from the cumulative projects to unknown and known cultural resources including human remains that would result in a cumulative adverse effect. The Proposed Project's contribution to these effects is minor, but given the sensitivity of this region, would result in a significant cumulative impact absent mitigation. With the mitigation measures described in Section D (Cultural Resources) the Proposed Project's contribution would be less than cumulatively considerable. This significance determination would not change if the connected actions were included in Table E-1.

C2-13      The commenter strongly disagrees with the DEIR/DEIS significance finding for cumulative cultural resource impacts and requests to meet with the California BLM State Director to discuss substantive issues related to tribal consultation and adverse impacts of utility-scale renewable energy projects of cultural resources.

While the cultural resource analyses for projects under the cumulative scenario and for connected actions demonstrate that those projects will have significant impacts, the contribution of cultural resource impacts owing to the Proposed Project are relatively minor. There are no known historic properties (NRHP-eligible resources) within the Proposed Project that would be impacted. Impacts to cultural resources could be significant if new resources are discovered during construction. However, the CRMP being developed under Section 106, will ensure that any significant impacts to new discoveries are reduced to a level that is less than significant. Therefore, the Proposed Project does not contribute significantly to cumulative impacts.

The comment states that the Colorado River Indian Tribes wishes to consult with BLM regarding adverse impacts to cultural resources. The BLM has initiated government-to-government consultation for the Project under Section 106, seeking tribal input during development of the Memorandum of Agreement and accompanying CRMP, NAGPRA Plan of Action, and Tribal Involvement Plan, and BLM is aware of the Tribes' request.

**Comment Set D1 – Workshop Transcript - Banning 9-1-15**

**SCE's Proposed West of Devers Upgrade Project**

Workshop on Draft EIR/EIS  
California Public Utilities Commission  
Bureau of Land Management

Workshop Presentation  
Banning, California  
September 1, 2015

Reported by:  
TINA MARIE LITCHFIELD  
CSR No. 12409  
Job No. 2126406

**Comment Set D1 – Workshop Transcript - Banning 9-1-15 (cont.)**

SCE's Proposed West of Devers Upgrade Project

Workshop Meeting Open to the General Public, Reported by Tina Marie Litchfield,  
Certified Shorthand Reporter No. 12409. Meeting held at City Council Chambers, 99  
East Ramsey, Banning, California, September 1, 2015 from 7:00 p.m. to 9:00 p.m.



**Comment Set D1 – Workshop Transcript - Banning 9-1-15 (cont.)**

**PUBLIC COMMENTS BY:**

UDO KIER  
55790 Amethyst Drive  
Whitewater, California 92282

LANNY SWERDLOW  
15815 Painted Hills Road  
Whitewater, California 92282

Comment Set D1 – Workshop Transcript - Banning 9-1-15 (cont.)

Banning, California, September 1, 2015  
7:00 p.m.

**MR. BRITT:** Good evening. My name is Chester Britt. I'm with Arellano and Associates, part of the consultant team for today's Southern California Edison Proposed West of Devers Upgrade Project.

D1-1

This is a workshop of the Draft Environmental Impact Report, Environmental Impact Statement.

[Presentation text has been omitted from this transcript; we retain only the comments from the public]

**MR. SWERDLOW:** My name is Lanny Swerdlow, 15815 Painted Hills Road, Whitewater, 92282.

The question is: What are the impacts of the changes going to have on my property, how does that affect my easement?

And what once the project is completed, what will I be able to do on that land with the project there? What kind of structure can I build? What can I store there? That type of thing.

**MR. BRITT:** That is perfect. It will be in the formal record, and as part of the final document, it will be responded to.

**MR. SWERDLOW:** Who will respond?

**MR. BRITT:** Aspen Environmental helps the agencies complete the final document.

**MR. SWERDLOW:** When will I get an answer?

**MR. BRITT:** Officially you'll get it when the final document comes out. It will be in the final document, the answer.

**MR. SWERDLOW:** Then at that point, will it be too late to make a complaint? When I get the answer, if I'm not happy with the answer, because the document is final; I cannot do anything. So it would seem to me I should get an answer before the comment period is over. I came here expecting to get answers, and what I'm getting is that nobody knows.

Comment Set D1 – Workshop Transcript - Banning 9-1-15 (cont.)

**MS. LEE:** Well, I think the problem is nobody at this meeting knows. There is nobody here to answer the question. But we will help you get answers.

D1-1  
cont.

**MR. SWERDLOW:** If I have to wait until the final report is out there to get an answer; it does not do any good.

**MS. LEE:** We will see if we can get you an answer. We have your contact information and your address.

**MR. SWERDLOW:** Use my PO Box. Do not use the address, it will not get there. So now what happens?

**MR. BRITT:** Well, as Susan mentioned, she is the project manager from Aspen. So she will take your question today and circle back with Edison and the agencies and hopefully be able to get you an answer.

**MR. SWERDLOW:** Before the end of the comment period?

**MR. BRITT:** Right. That is correct.

**MS. LEE:** Get my card before you leave and feel free to follow up.

**MR. SWERDLOW:** I should not have to follow up.

**MS. LEE:** If you do not hear from us soon enough, you can call me.

**MR. KIER:** I have a question. I understand the gentleman, because I'm in the same situation. I bought on Amethyst Road three properties. Nobody told me the easement is there. One day I said, "What is this red marker behind my fence?" which is half of my property. They said, "That is the line for the easement." I, exactly like this gentleman, I don't know what I can do with three properties, half of them does not belong to me. I'm going to put it in writing. But it's the same, I'm in the same situation that I don't know, I'm not allowed to put a plant there, I have to keep it clean, I pay tax for it and it's on my property in a way. That is what I and Mr. Swerdlow is in the same situation. We all are in the same situation there. I do not want to have wires 20 feet from my bedroom. I just do not want that. I will put it in writing.

D1-2

And I just bought the property two months ago and nobody told me about the easement.

**Comment Set D1 – Workshop Transcript - Banning 9-1-15 (cont.)**

**MR. KALISH:** A comment I would like to make is when you do submit a comment, be very specific as far as what your concerns are, how you view or what you anticipate the impacts or effects on you are going to be were the project to be approved. The more specificity the better.

**MR. BRITT:** Anyone else?

All right. I thank you for taking time out of your schedule to be here tonight. This is third of three meetings.

This concludes the meeting.

**Comment Set D1 – Workshop Transcript - Banning 9-1-15 (cont.)**

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that a record of the proceedings was made by me using machine shorthand, which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

I further certify I am neither financially interested in the action nor a relative or employee of any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: 09/14/2015

<%signature%>  
Tina Marie Litchfield  
CSR No. 12409

#### Comments from Mr. Swerdlow

- D1-1 Mr. Swerdlow asked about the impacts on his property of changes resulting from the Proposed Project and what he would be able to do on the land within the easement with the project in place.

The existing SCE easement to be used by the Proposed Project occupies about 40 percent of Mr. Swerdlow's parcel, and currently there are two sets of transmission lines passing through it, along with two access roads paralleling the lines. With the Proposed Project, the easement boundary would not change but the two sets of existing structures would be removed, replaced with one new set of transmission structures at the south edge of the easement. Mr. Swerdlow's concern about allowable uses of his land within SCE's easement was forwarded to SCE in emails dated September 3, 2015 and September 8, 2015. Also, on September 8, the EIR team provided Mr. Swerdlow with a detailed map of his parcels, the locations of SCE's easement boundaries, and the locations of towers to be removed and installed as part of the Proposed Project. Allowable uses would need to be consistent with the terms of the easement and with safety and access requirements as determined by the utility.

#### Comments from Mr. Kierspe

- D1-2 Mr. Kierspe provided oral comments which he subsequently provided in written form (Comment Letter E30). Please see Responses to Comments E30-1 through E30-3.

Comment Set E1 – Joe E. Rose

Email: West of Devers Upgrade Project EIR/EIS Team

**From:** Rose, Joe <JRose@semprautilities.com>  
**Sent:** Tuesday, August 11, 2015 8:39 AM  
**To:** West Of Devers Project  
**Cc:** j Rose (jdkrose@gmail.com); 'brendajoy4u@gmail.com'; 'bmtcouncilmembermikelara@yahoo.com'; 'jfox550@gmail.com'; 'mark@markorozco.com'; 'OurFocusOurKids@gmail.com'  
**Subject:** West of Devers Section 4 Edison Upgrade Concerns

Aspen Environmental Group, (BLM/CA/PL-2015/012+1793, DOI-BLM-CA-060-0015-0021)

I currently reside at 34660 Boros Blvd, Beaumont, California 92223. I have some concerns regarding the Draft EIR/EIS alternatives. First and foremost, any further encroachment of power transmission towers to the south is unacceptable. I am vehemently opposed to the towers or power lines becoming any closer to my residence than are currently in place. My backyard is an active place with children swimming and playing in the yard. I am extremely concerned with the long-term effects of EMF exposure to children. There is plenty of room on the north side of the Edison right-of-way to place the proposed towers. The enormity of the size of the proposed towers will have less effect on the environmental aesthetics if placed on the north side of the existing right-of-way. There are currently no existing homes effected by an encroachment to the north. If Edison wants to avoid a lawsuit and financial hardship similar to the fiasco in Corona Hills, they may want to reconsider the environmental impact to existing homes.

I recently moved from my home at 35484 Snead Street in Beaumont to get away from the Edison power lines. There is a strong EMF presence at that location. My current location does not have EMF issues as the power lines are far enough away. Please keep it that way.

I am cc'ing the Beaumont Mayor and City Council for their awareness and attaching the link to the CPUC informational website.

<http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/toc-deir.htm>

**Joe M. Rose**  
Mobile 951-922-6350  
[jdkrose@gmail.com](mailto:jdkrose@gmail.com)

E1-1

#### Responses to Comment Set E1 – Joe M. Rose

E1-1        The commenter is opposed to transmission towers and line coming closer to his residence and suggests moving the line to the north side of the ROW. He is also concerned about EMF effects.

The commenter's opposition to placement of new towers to the south of the existing towers and closer to his residence is noted, as is his support for the Tower Relocation Alternative. This residential property is on Boros Boulevard between Venturi Avenue and Armour Avenue in the City of Beaumont, approximately 500 feet south of the existing transmission line. The ultimate location of towers would be determined by final engineering; however, the current planned location of the nearest new tower is in the same location as the existing tower. This is no closer than the existing line. See EIS Appendix 2 (Detailed Maps) Figure Ap.2-14. The new tower is M88-T1, the existing tower is 4S56.

Please refer to General Response GR-6 for a discussion of Electric and Magnetic Fields (EMF).



Comment Set E2 – Dennis Rice

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** dennisrice@reagan.com  
**Sent:** Saturday, August 29, 2015 2:58 PM  
**To:** West Of Devers Project  
**Subject:** Relocation of Towers

As a resident of Solera Oak Valley Greens Association located in Segment 4 ,  
Beaumont and Banning, of the West of Devers Upgrade Project, I support the  
Tower Relocation Alternative that moves the new towers farther from residences  
such that the new towers will not be closer to residential areas than existing  
towers.

E2-1

Dennis Rice  
951-769-9170  
[dennisrice@reagan.com](mailto:dennisrice@reagan.com)

**Responses to Comment Set E2 – Dennis Rice**

- E2-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E3 – Regina Tierney

Email: West of Devers Upgrade Project EIR/EIS Team

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**From:** Reggie Tierney <greyhownd@aol.com>  
**Sent:** Sunday, August 30, 2015 8:48 AM  
**To:** West Of Devers Project  
**Subject:** West of Devers Upgrade Project

Dear Sir or Madam:

As a homeowner in Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I urge that the Tower Relocation Alternative be approved. The original plan for relocation would move the new towers closer to the residential areas than the current towers. Every effort should be made to place the proposed towers as far from the homes as possible.

E3-1

Respectfully,

Regina Tierney  
1572 Autumn Court  
Beaumont, CA 92223  
951-267-3622

<http://pete-vs-sarcoma.blogspot.com/>

**Responses to Comment Set E3 – Regina Tierney**

- E3-1        The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and placing the proposed towers as far from homes as possible is noted.

Comment Set E4 – Carol Doyle

Email: West of Devers Upgrade Project EIR/EIS Team

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**From:** mdoyle89037@roadrunner.com  
**Sent:** Sunday, August 30, 2015 1:25 PM  
**To:** West Of Devers Project  
**Subject:** West of Devers Upgrade Project

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residents such that the new towers will not be closer to residential area than existing towers.

E4-1

Carol Doyle

**Responses to Comment Set E4 – Carol Doyle**

- E4-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E5 – Gary M. Stoh

Email: West of Devers Upgrade Project EIR/EIS Team

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**From:** Garymstoh@aol.com  
**Sent:** Monday, August 31, 2015 2:34 PM  
**To:** West Of Devers Project  
**Subject:** COMMENT RE WEST OF DEVERS UPGRADE PROJECT

I attended the Workshop held at the Holiday Inn Express on August 26, 2015 in Beaumont, CA. Following are my comments with regards to the project:

E5-1

"As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers."

Regards,  
Gary M. Stoh  
951 Gleneagles Road  
Beaumont, CA 92223  
951-845-1981

**Responses to Comment Set E5 – Gary M Stoh**

- E5-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.



Comment Set E6 – John Christensen

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** John Christensen <john761936@gmail.com>  
**Sent:** Monday, August 31, 2015 3:48 PM  
**To:** West Of Devers Project  
**Cc:** Home  
**Subject:** West of Devers Upgrade Project

Billie Blanchard (CPUC PM)/Frank McMenimen (BLM PM)  
California Public Utilities Commission and Bureau of Land Management  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002

As a resident of Solera Oak Valley Greens Association located in Segment 4 ,  
Beaumont and Banning, of the West of Devers Upgrade Project, I support the  
Tower Relocation Alternative that moves the new towers farther from residences  
such that the new towers will not be closer to residential areas than existing  
towers.

E6-1

Respectfully  
John Christensen  
833 Westchester Rd.  
Beaumont CA 92223

**Responses to Comment Set E6 – John Christensen**

- E6-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E7 – Bernard Dale

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Bernard Dale <lobcbd@yahoo.com>  
**Sent:** Monday, August 31, 2015 5:46 PM  
**To:** West Of Devers Project  
**Subject:** metal towers

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers"

E7-1

Bernard Dale

Solera Resident

**Responses to Comment Set E7 – Bernard Dale**

- E7-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E8 – Nick Gercis

Email: West of Devers Upgrade Project EIR/EIS Team

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**From:** Nick Gercis <nick.gercis@gmail.com>  
**Sent:** Wednesday, September 02, 2015 8:29 AM  
**To:** West Of Devers Project  
**Subject:** West of Devers Upgrade Project

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers.

E8-1

**Responses to Comment Set E8 – Nick Gercis**

- E8-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E9 – Steve Mehlman

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Steve Mehlman <smehl1506@aol.com>  
**Sent:** Wednesday, September 02, 2015 6:45 PM  
**To:** West Of Devers Project  
**Subject:** Alternates to the Draft EIR/EIS, West of Devers Upgrade Project

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers.

E9-1

Thank you,

Steve Mehlman  
1736 Desert Almond Way  
Beaumont, CA 92223

**Responses to Comment Set E9 – Steve Mehlman**

- E9-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.



Comment Set E10 – Michael Gilbert

## Comment Form

West of Devers Upgrade Project  
Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:  
<http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 8/26/15

Name\*: MICHAEL GILBERT

Affiliation (if any)\*: \_\_\_\_\_

Address\*: 1592 AUTUMN COURT

City, State, Zip Code\*: BEAUMONT CA 92223

Telephone Number\*: 951-849-9117

Email\*: MIKE1592@tiscali.net

Comment\*: I live along the south ROW line in the Sovere  
subdivision. There is currently a transmission line within  
50 feet of my house. Given a choice, I would prefer  
an alternative that moves the proposed transmission lines  
further to the north. This would help mitigate the  
increase in magnetic and electric fields I will be  
subjected to in the original proposal. Thank You.

E10-1

Please send me notifications by: ☐ email ☒ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed.

Please submit comments no later than September 22, 2015. You may also submit comments by email to [westofdevers@aspenerg.com](mailto:westofdevers@aspenerg.com) or by phone (888) 456-0254.

### Responses to Comment Set E10 – Michael Gilbert

E10-1      The commenter is a resident along the southern right-of-way line of the Solera Oak Valley Greens Association in Segment 4 with a transmission line within 50 feet of his house. The commenter's support for an alternative that would move the lines to the north is noted. The commenter also is concerned about a potential increase in electric and magnetic fields due to the Proposed Project.

The Tower Relocation Alternative, which is described in Section C.4.1 and in Appendix 5, Section 4.2 of the EIS and is fully evaluated for each environmental discipline in the EIS, would use about 50 feet of vacant ROW width identified for future transmission lines to place towers farther away from adjacent residences. This alternative would change structure placement only in portions of Segment 4 and Segment 6, including by the Solera residential development. The Tower Relocation Alternative was found to be environmentally superior to the Proposed Project in Section G.4.1 (Tower Relocation Alternative) of the EIS.

Please refer to General Response GR-6 for a discussion of Electric and Magnetic Fields (EMF).

Comment Set E11 – Stan Fogg

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** stan fogg <sfogg65@gmail.com>  
**Sent:** Thursday, September 03, 2015 4:44 PM  
**To:** West Of Devers Project  
**Subject:** WEST OF DEVERS UPGRADE PROJECT

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers.

E11-1

Stan Fogg

**Responses to Comment Set E11 – Stan Fogg**

- E11-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E12 – Kathy Kelehan

Email: West of Devers Upgrade Project EIR/EIS Team

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**From:** Kathy Kelehan <kkelehan@yahoo.com>  
**Sent:** Thursday, September 03, 2015 4:46 PM  
**To:** West Of Devers Project  
**Subject:** WEST OF DEVERS UPGRADE PROJECT

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers.

E12-1

Kathy Kelehan

**Responses to Comment Set E12 – Kathy Kelehan**

- E12-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E13 – Susan and Helmuth Fritz

## Comment Form

West of Devers Upgrade Project  
Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:

<http://www.csw.ca.gov/environment/info/osp/en/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 9/6/15

Name\*: Helmuth and Susan Fritz

Affiliation (if any)\*: Solera Oak Valley Greens homeowner

Address\*: 1019 Coto de Caza Ct

City, State, Zip Code\*: Beaumont, CA 92223

Telephone Number\*: 360-623-9817 Cell

Email\*: fritzsj@hotmail.com

Comment\*: During the recent Workshop on this project at the Holiday Inn, Susan Lee presented Alternates to the Draft EIR/EIS, one of which affects only 29 pairs of new towers, moving them farther from residences. This way the new towers would not be closer to residential areas than the existing towers. We strongly support this rather than the current proposal that would bring the tower closer to residences in Solera, which would have a very negative effect on property values here. We believe this is a viable alternative to the current proposal and definitely should be given priority.

E13-1

Please send me notifications by: ☒ email ☐ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law; if you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed.  
Please submit comments no later than September 22, 2015. You may also submit comments by email to [westofdevers@aspenerg.com](mailto:westofdevers@aspenerg.com) or by phone (888) 456-0254.

### Responses to Comment Set E13 – Susan and Helmuth Fritz

E13-1      The commenters express support for the Tower Relocation Alternative, which would move 29 pairs of new towers farther from residences. They feel closer towers would have a negative effect on property values.

The commenter's support for the Tower Relocation Alternative, especially in the area of the Solera subdivision, is noted. The Tower Relocation Alternative is described in Section C.4.1 and in Appendix 5, Section 4.2 of the EIS. The Tower Relocation Alternative would use about 50 feet of vacant ROW width identified for future transmission lines to place towers farther away from adjacent residences than the Proposed Project in portions of Segment 4 and Segment 6, including by the Solera residential development.

No change in the EIS is required in response to this comment. In response to the concern about property value impacts from the Proposed Project, please see General Response GR-5 (Property Values).



Comment Set E14 – Gary and Kathleen Frisbie

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Gary Frisbie <katgoose1@verizon.net>  
**Sent:** Monday, September 07, 2015 9:19 AM  
**To:** West Of Devers Project  
**Subject:** Re: Solera Community Tower Relocation Alternative

Dear California Public Utilities Commission PM Billie Blanchard and Bureau of Land Management PM Frank McMenimen,

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers.

E14-1

My wife Kathleen and I are homeowners near the Solera Edison Easement known as the Greenbelt. Our concerns are for safety of the residents who live near the easement and for those who enjoy the easement for exercise and appreciation of the environment.

Moving the new towers closer to the southern perimeters of the easement is unnecessary and undesirable to residents. Please reconsider the location of the new southern side towers.

Thank you for acknowledging the wishes of the residents of Solera Community.

Sincerely,

Gary and Kathleen Frisbie

#### Responses to Comment Set E14 – Gary and Kathleen Frisbie

E14-1 The commenter is a resident of the Solera Oak Valley Greens Association on the southern side of SCE's right-of-way in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

The commenter is concerned about the safety of residents who live near the easement, known as the "Greenbelt," and for those who use the easement for exercise and appreciation of the environment. Impacts to recreation, including within the Greenbelt, are described in Section D.15 (Recreation) of the EIS. Implementation of Mitigation Measures R-1a (Coordinate construction schedule and activities with the authorized officer for the recreation area) and R-1b (Coordinate with local agencies to identify alternative recreation areas) would ensure that recreational users are informed of scheduled construction activities and informed of alternative areas for use.

Section D.21 (Electrical Interference and Safety) of the EIS describes potential electrical hazards and interference impacts from the proposed transmission lines. The Proposed Project's direct and indirect impacts to electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints). Mitigation Measure EIS-1a ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b ensures complaints regarding electronic interference would be logged and resolved to the extent feasible. Mitigation Measure EIS-2a (Implement grounding measures) ensures minimization of induced voltages that could create shocks or currents. Please refer to General Response GR-6 for a discussion of Electric and Magnetic Fields (EMF).

Comment Set E15 – Sandi Joel

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Sandi Joel <srjoel@verizon.net>  
**Sent:** Monday, September 07, 2015 9:45 AM  
**To:** West Of Devers Project  
**Subject:** Concerns

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers **farther** from residences such that the new towers will not be closer to residential areas than existing towers.

E15-1

Thank you for your consideration.

**Responses to Comment Set E15 – Sandi Joel**

- E15-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E16 – Lane Joel

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Lane Joel <lsjoel@verizon.net>  
**Sent:** Monday, September 07, 2015 10:41 AM  
**To:** West Of Devers Project  
**Subject:** Concerns

**Subject:** Concerns

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers **farther** from residences such that the new towers will not be closer to residential areas than existing towers.

E16-1

Thank you for your consideration.

**Responses to Comment Set E16 – Lane Joel**

- E16-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E17 – George Newlin

## Comment Form

### West of Devers Upgrade Project

### Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:

<http://www.cdwr.ca.gov/environment/info/open/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 9/1/2015 \_\_\_\_\_

Name\*: George J. Newlin \_\_\_\_\_

Affiliation (if any): \* \_\_\_\_\_

Address\*: 1648 Snowberry Rd. \_\_\_\_\_

City, State, Zip Code\*: Beaumont, Ca. 92223 \_\_\_\_\_

Telephone Number: \* 951-797-0122 \_\_\_\_\_

Email\*: geonewlin@yahoo.com \_\_\_\_\_

Comment: \* "As a resident of Solera Oak Valley Greens Association located in Segment 4 ,

Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower

Relocation Alternative that moves the new towers farther from residences such that the

new towers will not be closer to residential areas than existing towers"

E17-1

Please send me notifications by: ☒ email ☐ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you

**Responses to Comment Set E17 – George Newlin**

- E17-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.



Comment Set E18 – John T. and Carolyn A. Washburn

## Comment Form

West of Devers Upgrade Project  
Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:

<http://www.cdpr.ca.gov/environment/info/ospen/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 09/04/2015

Name\*: JOHN T. AND CAROLYN T WASHBURN

Affiliation (if any)\*: SOLERA OAK VALLEY GREEN RESIDENCES

Address\*: 1729 DALEA WAY

City, State, Zip Code\*: BEAUMONT, CA 92223-8600

Telephone Number\*: 951-845-1411

Email\*: PSM84THREE@VERIZON.NET

Comment\*: WE ARE A RESIDENT OF THE SOLERA OAK VALLEY GREENS ASSOC. LOCATED IN "SECTION 4" OF THE BEAUMONT AND BANKING OF THE "WEST OF DEVERS UPGRADE PROJECT".

'E SUPPORT THE TOWER RELOCATION ALTERNATIVE THAT HAS BEEN SUBMITTED, MOVING THE NEW TOWERS FARTHER FROM OUR RESIDENCES SUCH THAT THE NEW TOWERS WILL NOT NOT BE EVEN CLOSER TO THE RESIDENCES AND THE RESIDENTIAL AREAS THEN THE EXISTING TOWERS ALREADY ARE.

THANK YOU, SINCERELY APPRECIATE CONSIDERATION.

John T. Washburn and Carolyn J. Washburn

Please send me notifications by: ☒ email ☒ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Your comments will help determine the scope and content of the environmental document and identify alternatives and measures to reduce impacts. Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please submit comments by June 12, 2014. You may also submit comments by email to [westofdevers@aspeng.com](mailto:westofdevers@aspeng.com) or by phone (888) 456-0254.

E18-1

**Responses to Comment Set E18 – John T. & Carolyn A. Washburn**

- E18-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E19 – Carla Bracken

*Carla Bracken*

September 4, 2015

Billie Blanchard (CPUC PM)  
Frank McMenimen (BLM PM)  
California Public Utilities Commission  
and Bureau of Land Management  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002

Dear Ms. Blanchard and Mr. McMenimen,

As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther away from residences such as that the new towers will not be closer to residential areas that the existing towers.

E19-1

Respectfully,

*Carla Bracken*

1690 Landmark Way  
Beaumont, CA 92223

**Responses to Comment Set E19 – Carla Bracken**

- E19-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E20 – Anthony and Frances Germana

## Comment Form

West of Devers Upgrade Project  
Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:

<http://www.cdcr.co.gov/environment/info/ospen/westofdevers/westofdevers.htm> Thank you for your comments.

Date: Sept 2, 2015

Name\*: ANTHONY AND FRANCES GERMANA

Affiliation (if any)\*: 1593 AUTUMN CT.

Address\*:

City, State, Zip Code\*: BEAUMONT CA. 92223

Telephone Number\*: 951-769-0990

Email\*: TONY FRAN @ ROADRUNNER . Com.

Comment\*: As a member/ resident of Solera Oak Valley  
Greens Ass. located in Segment "4" Beaumont and  
Banning, of the West of Devers Upgrade Project,  
I support the tower relocation alternative that  
moves the new towers farther from residences  
such that the new towers will not be closer to  
residential areas than existing towers.

E20-1

Please send me notifications by: ☐ email ☒ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed.

Please submit comments no later than September 22, 2015. You may also submit comments by email to [westofdevers@aspeneq.com](mailto:westofdevers@aspeneq.com) or by phone (888) 456-0254.

**Responses to Comment Set E20 – Anthony & Frances Germana**

- E20-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E21 – Ron Roy

Email: West of Devers Upgrade Project EIR/EIS Team

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**From:** Ron Roy [REDACTED]  
**Sent:** Thursday, September 10, 2015 12:54 PM  
**To:** West Of Devers Project  
**Subject:** Segment 4: Please put power lines/towers underground: Fairway Canyon

September 10, 2015

To whom it may concern:

From:

Ron Roy  
[REDACTED]  
[REDACTED]

Privacy: Please withhold my home address/email/phone from the record:

Regarding: West of Devers Project as it traverses through Segment 4 in West Beaumont/Eastern Calimesa Boundaries at Fairway Canyon Housing Development.

Please replace the following power lines and supporting towers with underground power distribution lines. Tower Numbers:

- o 4N48 thru 4N63
- o 4S48 thru 4S60
- o 4N45 thru 4N63

The above power lines and their towers run adjacent to the northern boundary of the Fairway Canyon Development (formerly known as part of the Oak Valley Specific Plan) in western Beaumont, from San Timoteo Canyon Road to near Interstate 10 by Plantation-on-the-Lakes mobile home park in the City of Calimesa (Beaumont/Calimesa city boundaries are demarked in-part by Tukwet Canyon Parkway).

E21-1

**Comment Set E21 – Ron Roy (cont.)**

These power lines and supporting towers should be removed for the following reasons:

E21-2

- They are near permanent open space with native vegetation that can provide fire fuel in the event of a downed power line.
- The area is a perpetually windy area with wind speeds quite often exceeding 20-30mph and sometimes up to 50-70mph. This increases the likelihood of downed power lines
- Most of these power lines/towers actually abut property lines of high quality residences in Fairway Canyon. As a result they are a blight to Fairway Canyon residents because:
  - o They are unsightly
  - o They provide an attractive nuisance to young children and teenagers who can be seriously injured while climbing the towers, or riding/walking underneath the towers
  - o They generate noise pollution- a droning sound that keeps local residents up at all hours of the day and night.
  - o Their appearance and concerns over safety/health negatively affect local property values.

E21-3

Thank you and I look forward to your earliest reply (email).

Sincerely

Ron Roy:



## Responses to Comment Set E21 – Ron Roy

E21-1 The commenter has requested that lines on three specific towers along the proposed 220 kV transmission lines be placed underground in the area of the Fairway Canyon Development in western Beaumont from San Timoteo Canyon Road to near Interstate 10 by Plantation-on-the-Lakes mobile home park in the City of Calimesa.

An underground alternative called the "Segment 4 Underground Alternatives in Calimesa, Beaumont, and Banning" was considered in this area in Section C.5.2 (Alternatives, Alternatives Eliminated from Full EIS Evaluation) and in Appendix 5, Section 5.3 (Alternatives Screening Report) of the EIS. Underground alternative routes were considered in both the transmission corridor and within roadways in the area, as shown in EIS Appendix 5, Figure Ap.5-7.

The EIS alternatives screening process concluded that this alternative would meet all three Basic Project Objectives and would be feasible considering technical, legal, and regulatory factors. Undergrounding the proposed 220 kV lines would also reduce or avoid visual impacts. However, it would result in much more severe construction impacts related to dust, ground disturbance, and traffic. Maintenance and repair times would also be increased. Furthermore, this segment of the right-of-way (ROW) for the Proposed Project is 400 feet wide. Therefore, there is room within the ROW to modify structure locations to reduce impacts to residences, as has been considered under the Tower Relocation Alternative (see EIS Appendix 5, Section 4.2). Due to a greater level of environmental impacts associated with undergrounding at this this location, and because another alternative, the Tower Relocation Alternative, has been identified to reduce visual impacts in affected areas, the Segment 4 Underground Alternative was eliminated from consideration in the EIS and has not been considered further.

E21-2 The commenter requests that the line be undergrounded due to concerns about open space and native vegetation, wildland fire, and regular high winds that can cause downed power lines. See Response to Comment E21-1 regarding an underground alternative in this area.

Impacts to native vegetation are considered in Section D.4 (Biological Resources - Vegetation). Impacts from wildland fire are discussed in Section D.20 (Wildland Fire). The transmission structures and conductor would be engineered following safety criteria based on wind loading in the area. SCE conducted meteorological studies for the specific area recognizing this may be a "special wind area." Therefore, the structures are designed to withstand "extreme" wind conditions.

In addition, Section B.4 (Operations and Maintenance) of the EIS describes that regular tree pruning would be performed to be in compliance with existing state and Federal laws, rules, and regulations and is crucial for maintaining reliable service, especially during severe weather or disasters. In addition to maintaining vegetation-free access roads, helipads and clearances around electrical lines, clearance of brush and weeds around poles and transmission tower pads, and as required by local jurisdictions on fee owned ROWs, is necessary for fire protection. A 10-foot radial clearance around non-exempt poles (as defined by California Code of Regulations Title 14, Article 4) and a 25- to 50-foot radial clearance around non-exempt structures (as defined by California Code of Regulations Title 14, Article 4) are maintained in accordance with Public Resource Code 4292.

E21-3 The commenter states that the transmission lines are a blight to the Fairway Canyon residences because they are unsightly, constitute an “attractive nuisance”, generate noise pollution (corona noise), and negatively affect property values.

The Proposed Project would be constructed primarily in an existing transmission corridor with structures already located therein. Matters pertaining to the Safety of the construction and operation of the WOD Upgrade Project are discussed in Section D.21 (Electrical Interference and Safety) and recreation impacts are discussed in Section D.15 (Recreation). In certain instances, for reasons of safety, access to some areas or facilities might be temporarily prohibited during construction. However, it is noted that, whether or not a project poses a legally actionable attractive nuisance is not a consideration of NEPA.

Audible noise from transmission lines is addressed in Section D.13 (Noise) of the EIS. Section D.13.3.3 (Impacts and Mitigation Measures) of the EIS concludes permanent day-night or 24-hour noise levels (Ldn or CNEL) would not substantially increase due to corona noise for any segment of the Proposed Project.

Aesthetic impacts are discussed in Section D.18 (Visual Resources). This project is proposed within an existing SCE transmission corridor occupied by existing lines. The EIS concludes that beneficial operational visual impacts would occur for the Proposed Project, as a whole, including in the area of Fairway Canyon, as a result of the consolidation of structure types within the ROW, more synchronized conductor spans, and overall reduction of structural complexity and visual contrast within the ROW when viewed from most locations. However, several mitigation measures have been recommended to reduce long term visual impacts along the route. For instance, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) would further ensure that the resulting impacts are an improvement and are, in fact, beneficial.

In response to the commenter’s concern about property value impacts from the Proposed Project, please see General Response GR-5 (Property Values).

Comment Set E22 – Linda Hall

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Linda Hall <computer.lady@yahoo.com>  
**Sent:** Thursday, September 10, 2015 5:52 PM  
**To:** West Of Devers Project  
**Subject:** West of Devers Upgrade Project, Segment 4

Billie Blanchard (CPUC PM)/Frank McMenimen (BLM PM)  
California Public Utilities Commission and Bureau of Land Management  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002

As a resident of Solera Oak Valley Greens, our home borders the easement located in Segment 4 , Beaumont and Banning, of the West of Devers Upgrade Project. The existing towers and power lines are currently within 50 feet of our residence. My neighbors and I certainly hope that the towers would not be moved closer to residences in our senior community. I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers. I am concerned of the health problems with living so close to the power lines.

E22-1

E22-2

Thank you for your help.

Linda Hall

1597 Ginger Lily Lane  
Beaumont, CA 92223

Linda Hall  
951-846-6770  
[Computer.Lady@Yahoo.com](mailto:Computer.Lady@Yahoo.com)

**Responses to Comment Set E22 – Linda Hall**

- E22-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4 and has towers within 50 feet of her residence. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.
- E22-2      The commenter is concerned about health problems with living so close to power lines. See Response to Comment E14-1.

Comment Set E23 – Rodolfo N. and Yolanda M. Velasco

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Ronavel Velasco <ronavel@ymail.com>  
**Sent:** Friday, September 11, 2015 10:17 AM  
**To:** West Of Devers Project  
**Subject:** West of Devers Upgrade Project

Sir/Madam:

We are residents of Solera Oak Valley Greens Association situated in Segment 4, Beaumont, West of Devers Upgrade Project. Please be informed that we fully support the Tower Relocation Alternative that will move the new towers farther from the residences such that the new towers will not be closer to residences than existing towers.

E23-1

Thank you very much for your consideration.

Sincerely,

Rodolfo N. Velasco  
Yolanda M. Velasco  
1741 Desert Almond Way  
Beaumont, CA 92223

**Responses to Comment Set E23 – Rodolfo N. & Yolanda M. Velasco**

- E23-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and no new towers closer to residences than existing towers is noted.

Comment Set E24 – Harry Smallwood

Email: West of Devers Upgrade Project EIR/EIS Team

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**From:** Harry Smallwood <hsmallwood@verizon.net>  
**Sent:** Friday, September 11, 2015 11:23 AM  
**To:** West Of Devers Project  
**Subject:** Tower Alternative Plan

To: Billie Blanchard  
(CPUC PM)/Frank McMenimen (BLM PM)  
California Public Utilities Commission and Bureau of Land Management  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002

From: Harry Smallwood  
1176 Cliffrose Way,  
Beaumont, CA 9222  
Internet Address: [HSmallwood@verizon.net](mailto:HSmallwood@verizon.net)

Gentlemen,

As a resident of Solera Oak Valley Greens Association, located in Segment 4 in Beaumont and Banning, I support the West of Devers Alternative Tower Relocation Plan that will move the towers further from Solera residences. Plus, it may well end the radio noise associated with the present location of the existing towers, making it possible to listen to radios without the continuous screeching as is now present.

Sincerely,  
Harry Smallwood  
A resident for over ten years.

E24-1

E24-2

#### Responses to Comment Set E24 – Harry Smallwood

- E24-1 The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and moving the towers farther from residences is noted.
- E24-2 The commenter is concerned about radio noise (interference) associated with the present location of the existing towers.

Section D.21 (Electrical Interference and Safety) of the EIS describes potential electrical hazards and interference impacts from the proposed transmission lines. In the event that the energized transmission line would potentially create interference with radio, television, communications, or electronic equipment, Mitigation Measure EIS-1b (Document and Resolve Electronic Interference Complaints) has been included in Section D.21 (Electrical Interference and Safety) of the EIS and would apply for the life of the project. Mitigation Measure EIS-1b requires SCE to respond to, document, and resolve radio/television/electronic equipment interference complaints received.

The Tower Relocation Alternative, which is described in Section C.4.1 and in Appendix 5, Section 4.2 of the EIS, would use about 50 feet of vacant ROW width identified for future transmission lines to place towers farther away from adjacent residences than the Proposed Project, including in the area of the Solera residential development, which will also likely reduce potential radio inference impacts.



Comment Set E25 – Sharon Waitman

## Comment Form

West of Devers Upgrade Project  
Riverside and San Bernardino Counties

Please print legibly. For more information, visit the project web site:  
<http://www.spus.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 9/11/15

Name\*: Sharon Waitman

Affiliation (if any)\*: \_\_\_\_\_

Address\*: 1045 Northview Dr

City, State, Zip Code\*: Beaumont CA 94223

Telephone Number\*: 951 316 8228

Email\*: IPCcomment@yahood.com

Comment\*: As A Solera Resident I Am

Concerned the proposed Edison

line improvements will be placed

too close to our homes.

Please send me notifications by: ☐ email ☐ mail ☒ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their name/address from the record which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed.

Please submit comments no later than September 22, 2015. You may also submit comments by email to [westofdevers@aspeneg.com](mailto:westofdevers@aspeneg.com) or by phone (888) 456-0254.

E25-1

## Responses to Comment Set E25 – Sharon Waitman

E25-1      The commenter is concerned that the proposed lines would be too close to residences.

The Tower Relocation Alternative, which is described in Section C.4.1 and in Appendix 5, Section 4.2 of the EIS and is fully evaluated for each environmental discipline in the EIS, would use about 50 feet of vacant ROW width identified for future transmission lines to place towers farther away from adjacent residences. This alternative would change structure placement only in portions of Segment 4 and Segment 6 where the EIS team has identified visual impacts, including by the Solera residential development. The Tower Relocation Alternative was found to be environmentally superior to the Proposed Project in Section G.4.1 (Tower Relocation Alternative) of the EIR. By shifting structures farther away from the closest residences, the Tower Relocation Alternative would achieve structure placements within the ROW that would appear more similar to the existing structure locations. As a result, the Tower Relocation Alternative would cause less incremental visual contrast, structure prominence, and view blockage compared to the Proposed Project when viewed from residential locations along the south side of the ROW.

Comment Set E26 – Corinne Slusser

Email: West of Devers Upgrade Project EIR/EIS Team

**From:** Todd & Corinne Slusser <slusser@pmt.org>  
**Sent:** Friday, September 11, 2015 4:42 PM  
**To:** West Of Devers Project  
**Subject:** Tower #38  
**Attachments:** Exhibit Map APN 517-211-015\_Slusser\_Property.pdf;  
ATT00001.txt; SCE DOC 83485.pdf; ATT00002.txt

To Whom it May Concern,

My name is Corinne Slusser and I own land that SCE wants to put tower #38 on. In the map below my parcel is Lot 131. That huge square is where the SCE wants to build a new tower. I bet you would want to buy that property and live under transmission lines wouldn't you? Definitely not and neither do I. The amount of land in the easement is huge, can't the tower be placed across the street or even better can't the existing lines be used?

E26-1

I have been in contact with Elizabeth Straley from SCE about the easement on the property but she has not had any answers for me. As you can see in the PDF file of the easement document, it was written in 1985. I owned the land before 1976. I did not sign this easement document nor was I compensated in any way for it. It says Highway Land Company granted the easement and was paid a whopping \$10 but I'm not sure who they are, not me evidently. At no time were they given any rights to grant changes to the easement.

E26-2

This piece of land was given to me by my now deceased grandfather. He gave it to me as a legacy to give my children or to sell if I needed the income. With this tower on it I will never be able to sell the property or even use it for my own personal use. I would not want to risk my families health living right next to this huge tower. I have been offered no compensation for SCE essentially stealing my land. There are already towers in the area, please continue to use what you already have in place.

Corinne Slusser  
slusser@pmt.org

Comment Set E26 – Corinne Slusser (cont.)

1870

FRAME NO.		
CONTROL NO. 28307	DATE 01-25-75	ROLL NO. 85-1013

83485 106632

**RIGHT-OF-WAY EASEMENT**

THE UNDERSIGNED, KROGER LAND COMPANY, a corporation,

for and in consideration of the sum of Ten Dollars (\$10.00), lawful money of the United States, paid by SOUTHERN CALIFORNIA Edison COMPANY LTD., a Corporation, receipt whereof is hereby acknowledged, hereby grants, bargains, sells and conveys unto said SOUTHERN CALIFORNIA Edison COMPANY LTD., a Corporation, its successors and assigns, those permanent and exclusive easements and rights of way to construct, reconstruct, maintain, operate, enlarge, improve, remove, repair and renew two electric transmission lines consisting of steel towers, wires, cables and other structures, including ground wires, both overhead and underground, and communication circuits with necessary and convenient foundations, insulators and cross-arms placed on said towers, and other appurtenances connected therewith, convenient and necessary for the construction, maintenance, operation, regulation, control and grounding of electric transmission lines for the purpose of transmitting, distributing, regulating, using and controlling electric energy. Together with the right and easement for roads, ingress, egress and other convenient purposes needed or desired at any time by the Grantee, and the right and easement to construct, reconstruct, maintain and operate the same, and the right to clear and keep clear said easements and the real property affected thereby, free from explosives, buildings, structures, trees, brush and inflammable materials, for the protection from fire and other hazards; in, under, upon, over and across a strip of land 300 feet wide upon the following described lands and premises, situated in the County of Alameda State of California, to-wit:

All that portion of Section 8, in Township 3 South, Range 3 East, U.S.B.M. W., which lies North of the State Highway (Banning-Mittemaster Highway).

Said strip of land is described as follows:

A strip of land 300 feet wide, the southerly and northerly boundary lines of which are parallel with and respectively 100 feet southerly and 200 feet northerly from a line described as follows:

Beginning at a point in the West line of said Section 8, distant 241.99 feet southerly, measured along said East line, from the Northwest corner of said Section 8; thence from said point of beginning, southerly, in a straight line, 5300 feet, more or less, to a point in the East line of said Section 8, distant 430.52 feet southerly, measured along said East line, from the Northeast corner of said Section 8.

The side lines of said strip of land to be shortened or extended so as to terminate in the West and East lines of said Section 8.

Comment Set E26 – Corinne Slusser (cont.)

1801

FRAME NO.		
CONTROL NO. 26507	DATE 01-25-95	ROLL NO. 85-F013

Grantee shall have the right to use existing roads and make such additions thereto, on the lands of the Grantor, as shall be convenient and necessary to the Grantee's use of said right of way strip.

Together with all necessary and convenient means of ingress and egress to and from said above described right of way strip, for the uses and purposes and the exercising of the rights herein granted. Said right of entry may be exercised by trucks, automobiles or other vehicles or by foot, as may suit the convenience of said Grantee, its successors or assigns.

The Grantors reserve the rights for water pipe lines and roads under and across the land described in this easement provided these rights do not interfere with the operation and maintenance of the transmission lines of the Grantee.

Grantee shall have the right to install and to use gates in any fence which are now or may be hereafter constructed on said lands of the Grantor, for the purpose of permitting convenient entry to said right of way strip. Any gates which are installed by Grantee on said lands shall be locked with Grantee's locks, and also, if the Grantor so desires, may be locked with the Grantor's locks, in such a manner that either can lock or unlock the gates. Any gates which are installed and locked by the Grantor and used by the Grantee shall be locked also by the Grantee's locks so that either can lock or unlock the gates.

Grantee shall have the right to make such surface cuts within said right of way strip as may be necessary to maintain the clearance from conductors to the surface of the ground that may be required by the orders of the State Railroad Commission, or other Governmental body having jurisdiction thereof, or as may be necessary for the economical construction, maintenance and operation of said transmission lines.

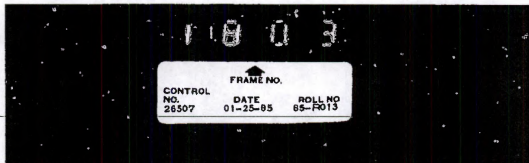
\* The Grantor, his heirs, successors or assigns, shall have the right to cultivate the land within the right of way strip for any and all crops which may be grown thereon, without interference with the rights herein granted to the Grantee, its successors or assigns, provided that said Grantor, his heirs, successors or assigns, in the use of said land, shall not permit or allow any accumulation of explosive or inflammable materials within the said right of way strip or so near thereto as to constitute, in the opinion of the Grantee, its successors or assigns, a menace or danger to said transmission lines. In case the Grantor, his heirs or assigns, shall grow orchard or other trees within the limits of said right of way strip, they shall not permit the same to attain a height in excess of 30 feet above the surface of the ground, and in case any such trees shall grow taller than said height, then the Grantor, its successors or assigns, shall have the right to trim the same in order to maintain said height as a maximum.

The Grantor grants to the Grantee, its successors and assigns, the right to trim or top and to keep trimmed or topped any and all trees on the lands of the Grantor adjacent to said right of way strip for a distance of 75 feet from the exterior lines of the right of way strip, to such heights as in the judgment of the Grantee, its successors and assigns, shall be reasonably necessary for the proper construction, operation and maintenance of said electric lines, but at no point outside the right of way strip to a height less than 20 feet.

It is understood and agreed that the grant of this easement does not convey to the Grantee any right, title or interest in any oil, gas or hydrocarbon substances or minerals within the limits of the right of way strip or otherwise, but that the Grantor, in prospecting for or developing oil, gas, hydrocarbon substances or minerals, will do so from adjacent land and in such a manner as not to interfere with the structures erected by the Grantee or with the operation of the transmission lines of the Grantee.

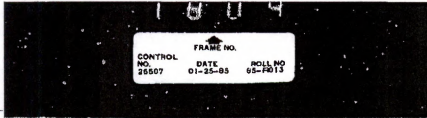
It is further understood and agreed that no other easement or easements shall be granted on, under or over said strip of land by the Grantor to any person, firm or corporation without the previous written consent of said Grantee.

Comment Set E26 – Corinne Slusser (cont.)



The Grantors reserve the rights for streets, graded, graded or otherwise), sewage lines, gas lines, electric lines and any and all other rights of way for facilities necessary in connection with the needs and convenience of inhabitants who may, at any time in the future, make their residence and carry on business operations on the property through which the within easement is granted, it being understood and agreed that said lines and rights of way are reserved by the Grantor for crossing, paralleling and/or covering the top surface, as well as underneath the land described in this easement, the Grantor not being required to apply to Grantee for permission to use any of the rights herein reserved, but shall at all times, as, if and when such rights are used, do so in such manner that they will not interfere with the operation and maintenance of the transmission lines of the Grantee.

Comment Set E26 – Corinne Slusser (cont.)



TO HAVE AND TO HOLD the above mentioned easements and rights unto SOUTHERN CALIFORNIA EDISON COMPANY LTD, its successors and assigns forever.

IN WITNESS WHEREOF, we have hereunto set our hands this 21st day of June 1915.

WITNESS:  
day of June 1915.

HIGHWAY LAND COMPANY

By Wm. J. [Signature] President  
By Edith [Signature] Asst. Sec'y.

STATE OF \_\_\_\_\_  
COUNTY OF \_\_\_\_\_ ss.

On this \_\_\_\_\_ day of \_\_\_\_\_, 1915, before me, \_\_\_\_\_, a Notary Public in and for said County and State, duly commissioned and qualified, personally appeared \_\_\_\_\_

known to me to be the person whose name \_\_\_\_\_ subscribed to the foregoing instrument, and acknowledged to me that \_\_\_\_\_ executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed a official seal in said County, the day and year in this certificate first above written.

Notary Public in and for the County of \_\_\_\_\_ State of \_\_\_\_\_

STATE OF CALIFORNIA, \_\_\_\_\_  
COUNTY OF \_\_\_\_\_ ss.

On this \_\_\_\_\_ day of \_\_\_\_\_, in the year one thousand, nine hundred and \_\_\_\_\_ A.D., before me, \_\_\_\_\_, a Notary Public in and for said County, personally appeared \_\_\_\_\_

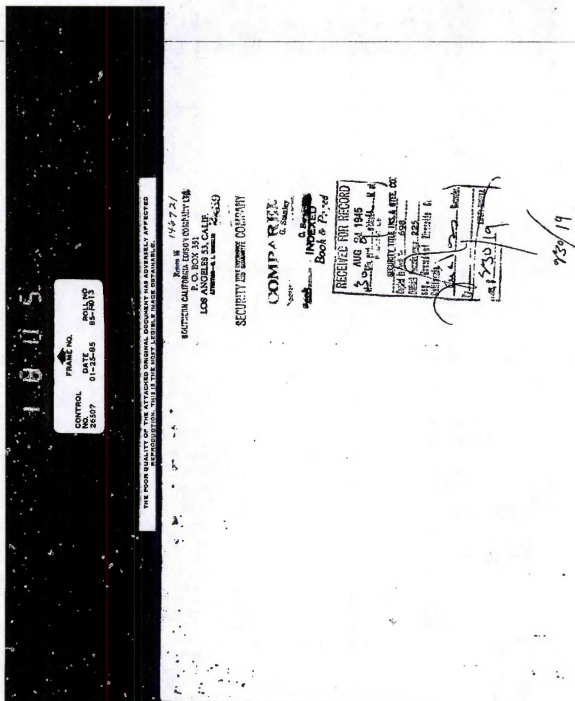
personally known to me to be the same person whose name is subscribed to the within instrument as a subscribing witness thereto, who, being by me duly sworn, deposed and said that he resides in the County of \_\_\_\_\_ State of California, that he was present and saw \_\_\_\_\_

personally knows him to be the same person \_\_\_\_\_ described in and whose name \_\_\_\_\_ subscribed to the within instrument as a party thereto, sign, execute and deliver the same; and that he acknowledged to said affiant that he executed the same; and that he, the affiant, then and there subscribed \_\_\_\_\_ name to said instrument as a witness.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in said County, the day and year in this certificate first above written.

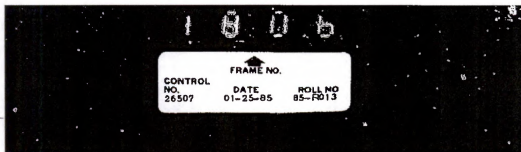
Notary Public in and for the County of \_\_\_\_\_ State of California

Comment Set E26 – Corinne Slusser (cont.)





Comment Set E26 – Corinne Slusser (cont.)



83485

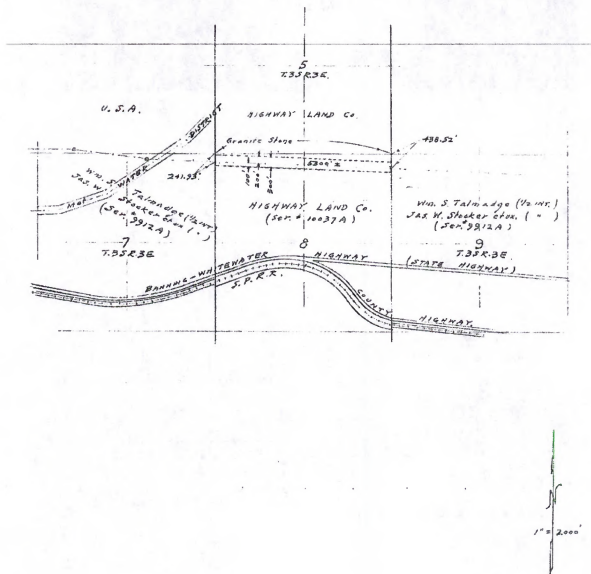
STATE OF CALIFORNIA, }  
County of Los Angeles } ss.

ON THIS 21st day of June, A.D. 1985 before me,  
Paul R. Olds  
a Notary Public in and for said County and State, personally appeared  
Paul R. Olds  
President, and Robert H. Landrum known to me to be the  
to be the ASST. Secretary,  
of Highway Land Company  
the Corporators who executed the within instrument, known to me to be the persons who  
executed the within instrument, on behalf of the Corporation herein named, and acknowledged  
to me that such Corporation executed the same.  
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and  
year in the certificate last above written.

J. Q. Olds Notary Public in and for said County and State.  
My Comm. Expires June 16, 1986.

ACKNOWLEDGMENT—COUNTY OF LOS ANGELES—FILED FOR RECORD—JUNE 18, 1985

Comment Set E26 – Corinne Slusser (cont.)



## Responses to Comment Set E26 – Corinne Slusser

E26-1 The commenter owns a parcel of vacant land in the Whitewater community at the northwest corner of Desert View Avenue and Amethyst Drive and asks if the tower proposed on her property can be relocated across the street or the existing lines reused.

The SCE easement covers approximately the northern half of her parcel, but there are currently no structures or conductors on or over this parcel. SCE's Proposed Project would install a new transmission tower in eastern portion of the northern half of her parcel. The commenter's opposition to this tower location, and her support for maintaining the existing configuration of towers in this area are acknowledged.

The commenter suggests that the new line be installed further north, off of her property and in the vacant portion of the easement. This area is being retained for additional future transmission lines, as described in Section E.2.3 (Cumulative Scenario, Future 500 kV Transmission Line). This is also addressed in the discussion of the requirement to maintain vacant space in the existing easement in Section A.2.3 (Introduction, CPUC and BLM Project Objectives), under Basic Project Objective 3 (to maximize the availability of remaining space in the corridor to the extent practicable, so future use of the corridor for additional transmission line upgrades is not precluded). In order to maximize the potential to install additional lines in this corridor in the future, SCE proposes to install the currently Proposed Project at the southern edge of the easement. The Tower Relocation Alternative and the Phased Build Alternative would both require that the new towers installed in this easement be moved at least 50 feet north of their proposed locations.

E26-2 The commenter states that the SCE easement was dated 1985 and no compensation was received by her and she did not sign it.

The date of 1985 is the date of the creation of the microfilm copy of the easement documentation. It appears that the documents provided with the comment are from 1945 (this year appears on each of the last two pages of the documents provided, the Received for Record stamp, and the Notary form). This pre-dates the commenter's acquisition of the property in 1976. Apparently, the easement was acquired prior to this commenter's acquisition of the property. Furthermore, because the easement precedes the property acquisition, there does not appear to be an issue of legal infeasibility for the Project and this issue is outside of consideration under NEPA.

Comment Set E27 – Marcia Tulledge

## Comment Form

West of Devers Upgrade Project  
Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:

<http://www.cpwt.co.gov/environment/info/ospen/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 9-5-2015

Name\*: Marcia C Tulledge

Affiliation (if any):\* —

Address\*: 1767 Dalea Way

City, State, Zip Code\*: Beaumont Ca 92223

Telephone Number\*: 951-922-6160

Email\*: mm.tulledge@netzero.com

Comment\*: As a resident of Sierra Oak Valley Greens Assoc located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences, such that the new towers will not be closer to residential areas than existing towers.

E27-1

Please send me notifications by: ☒ email ☐ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed.

Please submit comments no later than September 22, 2015. You may also submit comments by email to [westofdevers@aspeneq.com](mailto:westofdevers@aspeneq.com) or by phone (888) 456-0254.

**Responses to Comment Set E27 – Marcia Tulledge**

- E27-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and moving the towers farther from residences than the existing towers is noted.

**Comment Set E28 – Fran Zimmerman**

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Fran Zimmerman <calfranci@gmail.com>  
**Sent:** Saturday, September 12, 2015 1:49 PM  
**To:** West Of Devers Project

I support the tower relocation alternative that moves new towers farther from residences.

**E28-1**

**Responses to Comment Set E28 – Fran Zimmerman**

- E28-1      The commenter's support for the Tower Relocation Alternative that moves towers from residences is noted.

## Comment Set E29 – David Doherty

David Doherty  
55866 Amethyst Drive  
Whitewater, CA 92282  
[ddoherty818@earthlink.net](mailto:ddoherty818@earthlink.net)  
(760) 322-3677.

September 19, 2015

CPUC / BLM  
c/o Aspen Environmental Group  
235 Montgomery Street  
Suite 935  
San Francisco, CA 94104

re: SCE West of Devers plans for Whitewater

To the CPUC,

My name is David Doherty. I live at 55866 Amethyst Drive, White Water, California. I purchased my home free and clear in 2004. I am disabled and living on state disability payments. I am writing to you concerning the plans of Southern California Edison (SCE) to build a transmission tower on the vacant lot next to my home, and to string wires and conductors directly over my home, without mitigation or compensation to me or my neighbors. This will directly and significantly destroy the value of my home, which is my only significant asset. I urge you to reject this plan, and to require SCE to keep their powerlines within the corridor that they presently use approximately 50 feet behind my house.

There has been some confusion as to the geography of the status quo and the proposal, so allow me orient you to the geography of the area.<sup>1</sup> This view from Google Maps illustrates the status quo and the proposed location of Tower 6N38 (Figure 1). My house is at the bottom center of the photograph (marked by the icon). There are no houses to the east of mine or immediately across the street, and there are several houses to the west. There are several large vacant parcels to the north, separating my house from those on San Pierre Road. In between is a service road, used by SCE to tend to the existing transmission towers. My property line ends at the service road north of my house. There are two sets of SCE towers in the immediate neighborhood. They are marked by red ovals in Figure 1. They are both a considerable distance from my home, and the cables that are strung between them (represented by the red lines) are 50 feet or more behind my house and hang over empty land. Compare this to the red square near my house. This is where SCE proposes to locate Tower 6N38. Placing a tower there represents a radical departure from the status quo. There is a large corridor of desert scrub between

E29-1

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<sup>1</sup> This discussion parallels the questions raised in ALT-15 and ALT-16 of the CPUC's Data Request #7 on September 3, 2014.



Comment Set E29 – David Doherty (cont.)

dwelling through which SCE could string its cables without locating a tower next to my home, but it prefers to locate it next to my home.

E29-1  
cont.

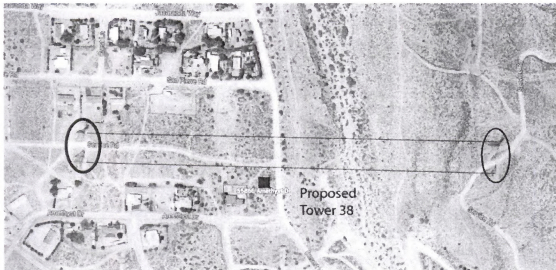
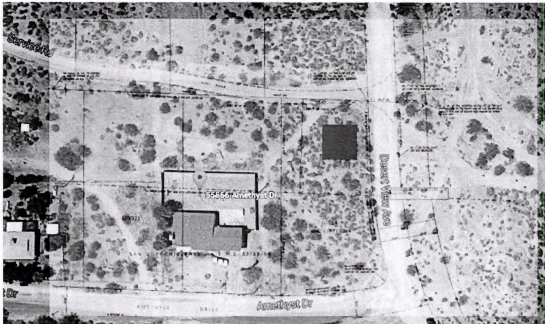


Figure 1. Status Quo Location of Towers and Power Lines and proposed location of Tower 6N38.

A closer view of the location of my house with respect to the proposed Tower 38 is visible in Figure 2. This figure is a composite of the Google Maps satellite image overlaid with a document provided to my neighbor Corinne Slusser (Exhibit Map APN 517-211-015\_Slusser\_Property.pdf). My house and the fence around my backyard are clearly visible. As anyone can see, the new tower and the fencing surrounding it will occupy roughly one-half of my neighbor's property and render it unbuildable. It will tower over my house destroying the view I currently enjoy of the local mountains and desert from my backyard. The cables strung between the towers will dangle and sway over my roof and backyard whenever the wind picks up, which is often since this is located in the San Geronio Pass. The noise will make my backyard unusable, and the transmission towers and the cables will be an eyesore.

E29-2

Comment Set E29 – David Doherty (cont.)



E29-3

Figure 2. S8866 Amethyst Drive and proposed location of Tower 38.

SCE has stated that it does not intend to compensate me or my neighbors for locating this tower on or next to our properties.<sup>2</sup> It argues that the existing easement, granted in 1945 before the land was subdivided, allows it to proceed without purchasing the property or mitigating any potential damage to property values.

“The ROW exists currently via grants of easement over the subject parcels. If additional rights are necessary for the this [sic] Project, SCE would acquire those rights via additional or modified grants of easement, not via fee-owned purchases. The additional or modified easements would not require that SCE acquire the entire parcel just those portions of the parcel where additional rights may be necessary.”

Response to Question ALT-16b, September 5, 2014.

This is a wholly inequitable and inadequate response. As illustrated above, there is significant open space within the right of way to build towers and hang transmission cables without encroaching onto residential parcels. By choosing to not locate within that corridor, SCE is choosing to harm me and my neighbors.

Locating a tower next to my backyard will diminish the value of my property in two ways. It will eliminate the charm due to its relative isolation and unimpeded views, which are significant

E29-4

<sup>2</sup> Response to Question ALT-16b, September 5, 2014.

Comment Set E29 – David Doherty (cont.)

considerations to me as an artist and to potential buyers who desire that aesthetic. In order to demonstrate the effect it will have, I have simulated it photographically (Figure 3).

E29-4  
cont.

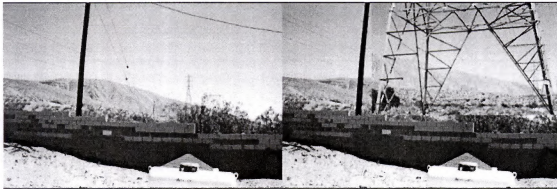


Figure 3. The view from my backyard and what it would look like with Tower 6N38.

In addition to destroying the aesthetic value of my house, the tower will reduce demand for my home, should I choose to sell it, by eliminating from the housing market those who for whatever reason are afraid of the health effects of living under power lines. Reducing demand is equivalent to reducing prices, as any undergrad economist knows. SCE has argued that there is no danger from powerline radiation, but that isn't the issue. It isn't enough to demonstrate that living under powerlines is harmless, just as demonstrating that vaccines do not cause autism has had no impact on anti-vaxxers. It is not rational, but it still drives the market. By hanging power lines directly over my home, SCE will destroy the value of my only significant asset, my home.

I began this process of objecting to SCE's placement of Tower 6N38 in May 2014. I have been on television, organized my neighbors, attended meetings, and written letters. SCE, when they have responded, have never acknowledged that their decision will destroy the value of my home. I suppose that by acknowledging harm they would be admitting that it needs to be mitigated, but their lack of acknowledgment does not mean that their actions will not have a direct and significant effect on my home. It is my hope that you will direct SCE to use an alternative site for the tower that is similar to the existing towers, one that uses the existing corridor for transmission lines, and that will not further diminish the already stressed property values along Amethyst Drive in Whitewater.

If you have any questions, please contact me at [ddoherty818@earthlink.net](mailto:ddoherty818@earthlink.net) or by telephone at (760) 322-3677.

Very truly yours,

David Doherty  
55866 Amethyst Drive  
Whitewater, CA 92282

## Responses to Comment Set E29 – David Doherty

E29-1 This comment describes the location of a property relative to the Proposed Project. This residential property is on Amethyst Drive near Desert View Avenue in Whitewater. The existing transmission corridor abuts the rear of the property. The proposed tower of concern is 6N38, shown on Figure AP.2-26 in Appendix 2, Detailed Maps.

This comment accurately describes the existing transmission infrastructure near this property, and the location of the proposed tower number 6N38, which would be about 130 feet northeast of the commenter's home.

E29-2 The commenter is concerned about aesthetic impacts of the transmission line from his residence, as well as conductor sway over his roof and backyard and corona noise.

Safety issues are discussed in Section D.21 (Electrical Interference and Safety). The transmission structures and conductor would be engineered following safety criteria based on wind loading in the area. SCE conducted meteorological studies for the specific area recognizing this may be a "special wind area." Therefore, the structures are designed to withstand "extreme" wind conditions. The horizontal movement or "sway" of a conductor in response to wind is called "blowout." Based on a conservative blowout clearance check performed by the EIS Team and done under extreme wind with the conductor at 70 degrees Fahrenheit, the proposed 1590 ACSR conductor would blow out approximately 43.3 feet from the centerline at mid-span. Closer to the tower structure the blowout would be much less because the conductor is closer to its attachment point and sag, and therefore blowout, would be less.

The commenter is located on Amethyst Drive in Whitewater. The closest part of the residence is approximately 75 feet south from the centerline of the towers. Therefore, the conductor is not expected to sway over the roof of the residence at any time.

The fence/wall around the commenter's backyard is approximately 30 feet from the centerline of towers. If located at mid-span, wire could blowout over the yard, but again, not over the actual residence. In this case, the residence is in fairly close proximity to proposed Structures 6N38 and D-EC106, therefore, the conductor is not expected to sway over the yard. See also Response to Comment E30-3 regarding similar concerns about conductor sway.

Audible noise from transmission lines is addressed in Section D.13 (Noise) of the EIS. Section D.13.3.3 (Impacts and Mitigation Measures) of the EIS concludes that Impact N-3 (Operational noise levels would increase due to corona noise from operation of the transmission lines and other project components) permanent would not substantially increase day-night or 24-hour noise levels (Ldn or CNEL) due to corona noise for any segment of the Proposed Project.

Aesthetic impacts are discussed in Section D.18 (Visual Resources). This project is proposed within an existing SCE transmission corridor.

E29-3 The commenter states that SCE does not intend to compensate him or his neighbors because the existing easement was granted in 1945 and allows SCE to proceed. The commenter identifies that there is open space in the ROW to build the towers without encroaching on residential parcels.

Compensation is not a matter considered in the EIS, but is a legal matter between the property owner and SCE. With regard to the potential use of the northern portion of the

easement (north of this parcel and currently unoccupied by transmission facilities), please see Response to Comment E26-1.

- E29-4 The commenter states that locating a tower next to his backyard will diminish the value of the property. The commenter is concerned that the tower and line would eliminate potential buyers concerned about potential health effects from power lines. The commenter urges that towers be located at their current sites and not be relocated.

The potential visual impact at this location is defined in Section C.18.3.3 (Visual Resources, Impacts and Mitigation Measures), for Key Observation Point (KOP) 13. This vicinity is depicted in Figures D.18-20A and D.18-20B.

The EIS addresses property values in Section D.8.3.3 (Socioeconomics and Environmental Justice, Impacts and Mitigation Measures). See in particular the discussion for Impact SE-5 (Construction of the project could adversely affect property values) where a review of pertinent literature on the subject is provided. The analysis concludes that there are no definitive answers about whether and to what degree the presence of a transmission line may affect property value. Please see also General Response GR-5 regarding property values.

In response to the commenter's concern about potential health effects of living under power lines, please see General Response GR-6 for a discussion of Electric and Magnetic Fields (EMF).

While the Proposed Project has preliminarily located the tower at the position shown in Figure AP.2-26, final engineering may result in an adjusted position. The EIS also includes two alternatives affecting tower locations in the Whitewater area, the Phased Build Alternative and the Tower Relocation Alternative. If adopted, the Phased Build Alternative would retain existing double-circuit towers and replace the existing single-circuit towers with new double-circuit towers. (See Appendix 5. (Alternatives Screening Report), Section 4.2 (Phased Build Alternative) and Figure Ap5-5a.) The Tower Relocation Alternative would shift some proposed towers further from the edge of the right of way. (See Appendix 5, Section 4.2 (Tower Relocation Alternative) and Figure Ap.5-3h, which shows the location of the relocated Tower 6N38, shifted north of the proposed location.) The CPUC and BLM will determine the final approved project, which may be the Proposed Project or alternatives to the project, or a combination of both.

**Comment Set E30 – Udo Kierspe**

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** udo kierspe <concreteblock@earthlink.net>  
**Sent:** Saturday, September 19, 2015 10:12 AM  
**To:** West Of Devers Project  
**Subject:** Re: CPUC / BLM West of Devers

CPUC / BLM  
c/o Aspen Environmental Group  
235 Montgomery Street  
Suite 935  
San Francisco, CA 94104

re: SCE West of Devers plans for Whitewater

Dear Sirs,

I just recently bought 3 half acre pieces of property in Whitewater, California and I have an issue with a utility expansion by Southern California Edison that I would like to bring to your attention.

SCE is currently planning to build a 165' metal power tower on vacant land east of my home for the "West of Devers Project" power upgrade and the cables from the structure will hang over my property.

I am a 71 year old veteran actor of over 200 films and long time resident of Palm Springs who was looking for a home that is close to town but still remote and inexpensive. While visiting a friend in Whitewater I found an ideal spot that had just come on the market and put in an offer. As I was purchasing this land I was not informed of the West of Devers expansion by the seller, the realtor or Southern California Edison. When my neighbor insisted that I ask the seller and realtor about these plans they had no idea what I was talking about. My realtor then called SCE and talked to Mr. Jeffrey Woodruff at (760) 445-1413 in the Planning Department who told me that "there will be no new power towers built in that area - only new power lines will be installed."

When I again tried to confirm the "No new towers" concept I learned from another SCE planner that the tower placement had not been finalized yet and won't be for a couple of months."

Through research I learned that there is a utility corridor easement on my property that was established in 1945 and a portion of this land was sold 13 years later as part of a development that included the lot that my home is on.

E30-1



Comment Set E30 – Udo Kierspe (cont.)

This easement was also reestablished in 1985. In studying the plans that SCE has for this project I find that they are attempting to take roughly one third of all 3 of my newly purchased properties for space to hang new high capacity power lines over with absolutely no plans to compensate me.

I asked an SCE representative if I could fence in my portion of the easement property or build on it and they replied that it would have to be within "SCE guidelines and permission would be required." I pay additional taxes on this property every six months due to extreme fire hazard in my immediate area this results in my having to maintain the easement land with brush clearance. Why was this property sold to me in the first place if the state can just give it to one of the wealthiest private corporations to have control over it while I supposedly "own", pay taxes and maintain it?

My neighbor David Doherty and I talked with SCE representatives about the fact that there is a large section of open property directly behind our homes that currently hosts the metal SCE towers - "Why do you have to move the poles closer to our homes and not leave them where they are?" They replied that the open area behind us is being saved for "Future Upgrades?" followed by the statement that - if we change the current plan to move away from the homes then they would have to get the permission of the people that live behind us. I explained that the open corridor behind us is separate from the homes and their expansion would not affect or be part of those residents property. From their reaction I think they were unaware of this fact as we pointed out where their easement borders are. Why can't they simply use the area that they referred to as future upgrade land, now?

I asked if they had any alternate plans other than building beside my home? The representatives said "No" they did not. In the online files of questions from the CPUC regarding the SCE plan they were asked if any alternate plans had been explored? SCE answered that they do have alternate routes for the towers and cables planned.

The California Public Utilities Commission asked a series of questions of SCE in the beginning stages of this project this being one- " c. Does SCE believe that all components of the proposed new towers (6N38, 6N39, 6N40, 6N41), including conductors at maximum sway, would remain within the current ROW boundaries? "

Part of SCE's reply "On the approximately 20 parcels that are at least partially within the ROW in this segment, there are currently 9 or 10 existing homes along the north side of Amethyst Drive which, given the proposed location of

E30-1  
cont.

E30-2

E30-3

Comment Set E30 – Udo Kierspe (cont.)

these towers, may have new conductors swaying over their homes. The new towers are moving south by about 55 feet (centerline to centerline)."

E30-3  
cont.

I am confused by the phrase "may have new conductors swaying over their homes?" The powerlines will be hanging directly over my property and that of my neighbors to the west and east of me. Currently there are no "old" conductors over my home so how could there be new ones? The lines being moved are presently about 50' behind my property in a wide open corridor that is perfectly suited for their needs and why SCE feels entitled to seize someones property when they have more than sufficient expansion room already - I don't understand.

I attended the meeting with the Environmental Impact Research group recently and they presented the ideal alternate plan of leaving the cables and the towers in the corridor behind the homes not above them that I think you should adopt.

Thank you,

Sincerely,

udo kierspe  
55790 amethyst drive whitewater ca. 92282  
please confirm receiving of this email  
thank you



## Responses to Comment Set E30 – Udo Kier

E30-1 The commenter owns three parcels in the Whitewater community, and approximately the northern half (100 feet) of each parcel is within an existing SCE easement. There are currently no lines or conductors over these properties; they are located just north of his northern property line. The commenter is concerned because SCE's Proposed Project would move the double-circuit 220 kV line about 150 feet to the south, so conductors would pass above the center of the northern half of his three parcels, and about 90 feet from his house. He states that he was not informed about the existing easement when he purchased the properties.

The easement currently held by SCE was granted in 1945, and should have been provided for review, as a component of a Preliminary Title Report, before the property was purchased. The EIS preparers cannot comment on the completeness or adequacy of information provided when property was purchased, and this not a topic that is addressed in the EIS review process.

E30-2 The commenter inquires why other parts of the ROW could not be used rather than the area on his properties.

Please see Response to Comment 26-1 for discussion of the potential future use of the currently vacant portion of the SCE right-of-way.

E30-3 The commenter raises a question about EIS Team's Data Request ALT-16b to SCE. This request asked about SCE's existing rights-of-way as they relate to the distance that the Proposed Project's conductors (wires) could sway from side to side in the wind, between the towers. The use of the phrase "new conductors" in the data request referenced the conductors that would be installed on the proposed new towers; SCE Towers No. 6N38 and 6N39 are located east and west of this property, and they would move the center of the transmission line right-of-way about 50 feet south of its current location.

Because the proposed new towers under the Proposed Project would move about 50 feet closer to the homes on Amethyst Drive than they are currently, the EIS team wanted to understand how far the conductors could sway at the lowest point of their sag between towers (this is where the sway is greatest). The question to SCE was requesting clarification specifically on the potential need for additional ROW to accommodate the distance that the proposed conductors could sway, after the new towers are installed approximately 50 feet further south than the existing towers. SCE's response was as follows:

The ROW exists currently via grants of easement over the subject parcels. If additional rights are necessary for ... this Project, SCE would acquire those rights via additional or modified grants of easement, not via fee-owned purchases. The additional or modified easements would not require that SCE acquire the entire parcel just those portions of the parcel where additional rights may be necessary.

For the commenter's information, the EIS team has calculated the approximate "blow out" (or sway) of the conductors (wires) that would hang on the proposed new tower just north-east of the commenter's property. The estimated maximum sway of the new conductor in this span would occur only at the midpoint of the span between the two nearest towers, which would be about 43 feet from the centerline of the new tower. The nearest home along Amethyst is about 65 feet from the tower centerline. The commenter's home is nearer to the proposed new tower, so the sway would be reduced, and would not likely sway into the fenced portion of his yard.

**Comment Set E31 – Kathie Dyson**

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Kathie Dyson <katdys@yahoo.com>  
**Sent:** Saturday, September 19, 2015 12:17 PM  
**To:** West Of Devers Project  
**Subject:** Devers Upgrade Project

"As a resident of Solera Oak Valley Greens Association located in Segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers farther from residences such that the new towers will not be closer to residential areas than existing towers"

E31-1

Kathleen Dyson  
Solera Resident

**Responses to Comment Set E31 – Kathie Dyson**

- E31-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and moving the towers farther from residences than existing towers is noted.

**Comment Set E32 – Timothy J. Pavlian**

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Tim Pavlian <tahoe@flyingcub@hotmail.com>  
**Sent:** Sunday, September 20, 2015 10:08 AM  
**To:** West Of Devers Project  
**Subject:** Tower Relocation @ Solera

As a resident of Solera Oak Valley Greens Association located in Segment 4 ,  
Beaumont and Banning, of the West of Devers Upgrade Project, I support the  
Tower Relocation Alternative that moves the new towers farther from residences  
such that the new towers will not be closer to residential areas than existing  
towers.

E32-1

Timothy J. Pavlian  
1543 High Meadow Drive  
Beaumont, CA 92223

**Responses to Comment Set E32 – Timothy J Pavlian**

- E32-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and moving the towers farther from residences than existing towers is noted.

**Comment Set E33 – W Elaine Morgan**

**Email: West of Devers Upgrade Project EIR/EIS Team**

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**From:** Elaine Morgan <welainemorgan@gmail.com>  
**Sent:** Monday, September 21, 2015 8:00 PM  
**To:** West Of Devers Project  
**Subject:** West of Devers Upgrade Project

To whom it may concern,

As a resident of Solera Oak Valley Greens Association located in Segment 4 , Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that was presented by Susan Lee at the meeting held on August 26, 2015 at the Holiday Inn Express.

The Alternative to the Draft EIR/EIS, which affects 29 pairs of new towers only, is to move them farther from residences so the new towers would not be closer to residential areas than the existing towers.

This alternative is superior to any that was presented and certainly is more respectful of the residents within Solera.

Thank you for your consideration,  
W. Elaine Morgan  
Solera Resident  
1730 Las Colinas Road  
Beaumont, CA 92223  
951.267.1341

E33-1

**Responses to Comment Set E33 – W. Elaine Morgan**

- E33-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and moving the towers farther from residences than existing towers is noted.

**Comment Set E34 – Leanne Weisskoff**

**Voicemail: West of Devers Upgrade Project EIR/EIS Team**

**Received:** Tue 9/22/2015 9:32 AM

My name is Leanne Weizkoff, and I am at 855 Sahalee Court, in Solera, in Beaumont, California, and I'm calling about the West of Devers Project, and I would like to go on record as being in favor and support of the alternative alignment, which moves the towers more in line with where they are now. The original alignment moves them closer to homes, which doesn't really seem necessary, and certainly would not be pleasant for those people who are in those homes and have been there for 10, 12 years.

I attended the meeting very shortly, and so I did hear the information and did see the maps and I am very much in favor of the alternate proposal.

My telephone number is 951-845-9289. I tried numerous times to do this by email, and for some reason my computer keeps telling me it doesn't recognize that address. which I don't understand. So that's why it's being done by phone on the last day. Thank you for paying attention to these things. Goodbye.

E34-1



**Responses to Comment Set E34 – Leanne Weisskoff**

- E34-1      The commenter is a resident of Sahalee Court in the Solera residential development in Segment 4. This residential property is approximately 0.3 miles north of the existing transmission line corridor. The commenter's support for the Tower Relocation Alternative and moving the towers farther from residences than existing towers is noted.

Comment Set E35 – Susan Diamond

## Comment Form

West of Devers Upgrade Project  
Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:

<http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm> Thank you for your comments.

Date: 9-19-2015

Name\*: Susan Diamond

Affiliation (if any)\*: NA

Address\*: 891 Westchester Rd

City, State, Zip Code\*: Beaumont CA 92223

Telephone Number\*: 951-769-7090

Email\*: harmondiamond@yahoo

Comment\*:

As a resident of Solera Oak Valley Greens Association located in segment 4, Beaumont and Banning, of the West of Devers Upgrade Project, I support the Tower Relocation Alternative that moves the new towers further from residences such that the new towers will not be closer to residential areas than existing towers.

E35-1

Please send me notifications by: ☐ email ☒ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed.

Please submit comments no later than September 22, 2015. You may also submit comments by email to [westofdevers@aspeneg.com](mailto:westofdevers@aspeneg.com) or by phone (888) 456-0254.

**Responses to Comment Set E35 – Susan Diamond**

- E35-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and moving the towers farther from residences than existing towers is noted.

Comment Set E36 – Ann Hasbargen

## Comment Form

### West of Devers Upgrade Project Riverside and San Bernardino Counties



Please print legibly. For more information, visit the project web site:

<http://www.cawc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm> Thank you for your comments.

Date: Sept 1, 2015

Name: Ann C. Hasbargen

Affiliation (if any):\*

Address: 1164 Lantana Road

City, State, Zip Code: Beaumont, CA 92223

Telephone Number: 951-769-4992

Email: aghas4@verizon.net

Comment: I am a resident of Solera Oak Valley Grove

Assoc. located in segment 4, Beaumont  
Parkway, of the West Devers Upgrade Project.  
I support the Tower Relocation Alternative  
that moves the new tower farther from  
residences such that the new tower will  
not be closer to residential areas than  
existing towers"

E36-1

Please send me notifications by: ☒ email ☐ mail ☐ I do not want to be on the project mailing list

\*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed.

Please submit comments no later than September 22, 2015. You may also submit comments by email to [westofdevers@aspenop.com](mailto:westofdevers@aspenop.com) or by phone (888) 456-0254.

**Responses to Comment Set E36 – Ann C. Hasbargen**

- E36-1      The commenter is a resident of the Solera Oak Valley Greens Association in Segment 4. The commenter's support for the Tower Relocation Alternative and moving the towers farther from residences than existing towers is noted.

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Comment Set F1 – Southern California Edison



Rebecca A. Furman  
Laura B. Renger

September 22, 2015

VIA EMAIL

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, California 94014  
westofdevers@aspeneg.com

Re: Southern California Edison's Comments to the Draft Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project

To Whom It May Concern:

This letter and accompanying attachments contain the comments of Southern California Edison Company ("SCE") on the Draft Environmental Impact Report/Draft Environmental Impact Statement ("DEIR/DEIS") for the West of Devers Upgrade Project ("WOD Upgrade Project" or "Proposed Project"). SCE appreciates the time and effort that went into developing the DEIR/DEIS and submits these comments in order to ensure that the analysis in the Final EIR/EIS is both complete and accurate.

F1-1

## I. INTRODUCTION

In the DEIR/DEIS, the California Public Utilities Commission ("CPUC") concludes that the Phased Build Alternative (an alternative developed by the authors of the document, the CPUC and the Bureau of Land Management ("BLM")), is the environmentally superior alternative.<sup>1</sup> For inexplicable reasons, the authors of the document have proposed a Phased Build Alternative which deviates significantly from the very purpose of the Proposed Project, contravenes the policy of the State of California to efficiently provide for the delivery of renewable energy resources to customer load, may be technically infeasible to construct, and creates higher net environmental impacts than the Proposed Project due to:

- visual impacts,
- physical footprint, and
- a requirement to enter the project corridor for extensive construction activities not once, but twice, to construct a project alternative that is inferior to the Proposed Project.

As demonstrated below, the DEIR/DEIS conclusion that the Phased Build Alternative is environmentally superior is fatally flawed.

<sup>1</sup> The BLM will select its Environmentally Superior Route in the Final EIR/EIS.

Comment Set F1 – Southern California Edison (cont.)

CPUC/BLM  
Page 2  
September 22, 2015

F1-1  
cont.

First, the Phased Build Alternative does not meet most of the project objectives and therefore is not a viable alternative under the California Environmental Quality Act (“CEQA”). The Phased Build Alternative does not meet the project objectives articulated by the authors in the DEIR/DEIS, nor does it meet SCE’s project objectives (which should be adopted as the project objectives in the Final Environmental Impact Report (“FEIR/FEIS”). Simply put, the Phased Build Alternative fails to meet the basic purpose and need for the Proposed Project.

Second, the Phased Build Alternative is not feasible as defined by CEQA. For an alternative to be considered feasible, CEQA requires that it is capable of being developed in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. That is not the case here. The Phased Build Alternative is technologically flawed, raising questions of whether it can be safely constructed in the right-of-way (“ROW”). In order to install the Phased Build Alternative’s 795 Aluminum Conductor Composite Reinforced (“ACCR”) conductor, planned wire sites would need to be modified and new wire sites would be required. These wire sites may need to be located within areas not previously analyzed. These areas could potentially be environmentally sensitive or located outside the existing ROW. The DEIR/DEIS does not recognize this important aspect of the Phased Build Alternative’s features, thereby omitting these meaningful impacts—impacts that would not be caused by the Proposed Project. Given these undesirable characteristics of the Phased Build Alternative, SCE considers it to be technologically infeasible under CEQA.

The Phased Build Alternative is also legally and economically constrained because the construction methods necessary to construct the Phased Build Alternative will require extended double-, triple- or quadruple-line outages of the existing transmission system that is being modified. The California Independent System Operator (“CAISO”) is unlikely to approve such extensive outages which could place the system at risk of not meeting reliability standards. Even if it did, such outages would lead to substantial generator curtailment, causing significant economic loss to generators currently connecting to the West of Devers lines. Additionally, the Phased Build Alternative would be legally infeasible if the Morongo Band of Mission Indians were to determine that by failing to obtain a CPCN for the Proposed Project, SCE has not met its contractual and legal obligations contained in the Proposed Transaction.<sup>2</sup> The Phased Build Alternative is also infeasible from a regulatory perspective, as it only satisfies a portion of the need for the project. The Phased Build Alternative provides for approximately one third less, or about 1000 MW less deliverability, compared to the Proposed Project. If the Phased Build Alternative were constructed, it is reasonably foreseeable that additional transmission capacity would be needed in the near-term, and there is currently not enough time to license and construct such a project, as transmission projects take many years to successfully license and construct. This risk is accentuated by the passage of SB 350 and increasing the RPS to 50% by 2030, which will likely have the effect of spurring additional renewable generation, the transmission of which is a key objective of the Proposed Project.

<sup>2</sup> As discussed in SCE’s Application and testimony, SCE and Morongo Transmission entered into a Development and Coordination Agreement that provides Morongo Transmission the option to lease transfer capability right in a portion of the Proposed Project in exchange for the Morongo Tribe’s consent to the ROW agreement that permits the Proposed Project to be built across the tribal trust lands of the Morongo Tribe. In sum, this transaction is referred to as the Proposed Transaction.



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Third, the Phased Build Alternative would result in greater environmental impacts than the Proposed Project by requiring SCE to remobilize construction efforts multiple times over subsequent phases to achieve what could have been accomplished in a single coordinated construction effort, resulting in extended disturbance periods, reduced efficiencies, and greater impacts. These increased environmental effects factor into the infeasibility of the Phased Build Alternative under CEQA.

Fourth, without fully analyzing or understanding the scope of the Phased Build Alternative, the DEIR/DEIS asserts that the Phased Build Alternative would have a reduced construction timeframe and would cost less than the Proposed Project. This is wrong. This unsubstantiated conclusion in the DEIR/DEIS completely misses and understates the necessary project scope elements, design and engineering work, conductor procurement and testing efforts, and construction requirements needed to actually build the Phased Build Alternative. The DEIR/DEIS then errs by making an inapt comparison of the cost of the Phased Build Alternative to SCE's Proposed Project, as it does not consider the reduced capacity of the first phase of the Phased Build Alternative, as well as the cost of the next phase of the Phased Build Alternative.

Further, the introduction of an entirely new alternative based on the "Project Alternative Assessment A Power Flow Analysis" prepared by the CPUC's transmission consultant, ZGlobal,<sup>3</sup> and then the selection of that alternative as the environmentally superior alternative, is inconsistent with how Certificate of Public Convenience and Necessity ("CPCN") applications are evaluated by the CPUC. The CEQA track of the proceeding evaluates the environmental impacts of the proposed project and a reasonable range of alternatives. SCE recognizes that it is appropriate for the DEIR/DEIS to consider alternatives that were not included in SCE's Proponent's Environmental Assessment ("PEA") if the CPUC and BLM determine that is necessary under CEQA and the National Environmental Policy Act ("NEPA"). However, here, the CPUC and BLM developed an entirely new alternative based on an untested and flawed analysis by ZGlobal. This is inappropriate because the CEQA track of the proceeding is not the place where the need determination should be made. Instead, the need determination will be established in the case-in-chief, where SCE will have the opportunity to file its own testimony, rebut counter testimony, and cross-examine witnesses. It puts the cart before the horse to rely on ZGlobal's analysis in the DEIR/DEIS before it has been subjected to critique in the case-in-chief. As explained in the attached comments, ZGlobal's analysis is fatally flawed—it does not adequately evaluate system needs and cannot be relied upon for transmission planning purposes or to determine the scope of the Proposed Project. It is misleading to the public and decision-makers to present the Phased Build Alternative as a viable environmental option when it fails to meet the project objectives and may be infeasible to implement. At a minimum, the DEIR/DEIS needs to clarify that the system planning assessment underpinning the Phased Build Alternative is preliminary and untested and may change following the case-in-chief testimony.

The DEIR/DEIS requires SCE to obtain a variance from local jurisdictions if SCE's construction will conflict with local noise ordinances. The CPUC has made clear that regulated public utilities are not required to obtain local agency discretionary approvals related to the construction of major transmission lines, such as the Proposed Project, including local noise

F1-1  
cont.

F1-2

<sup>3</sup> DEIR/DEIS, Appendix 5, "Alternatives Screening Report."

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variances. This well-established authority is grounded in the California Constitution, the Public Utilities Code, and General Order 131-D. Further, CEQA does not require a local agency noise variance to address this impact because all feasible mitigation measures are already being applied to reduce the noise impacts. A variance may also be infeasible under CEQA. Despite SCE's protests, in recent transmission licensing projects, the CPUC has ordered SCE to obtain a variance from local jurisdictions. In some of those instances, local agencies have declined to grant variance requests in a reasonable period of time, notwithstanding SCE's best efforts. For these reasons, the requirement to obtain a variance from local noise ordinances should be stricken from the DEIR/DEIS or, at a minimum, modified based on the language proposed by SCE.

**F1-2  
cont.**

SCE also has serious concerns about the visual analysis in the DEIR/DEIS. The mitigation for construction impacts, for both SCE's Proposed Project and the Phased Build Alternative, creates a process whereby, *after* the EIR/EIS is approved, staff will *re-analyze* every spur road, retaining wall, and ground disturbance area within Segments 2, 3, 4 and 6, resulting in an unknown number of project design changes even though the information is already available to include such analysis in the EIR/EIS. These design changes may raise new environmental or engineering constraints, which could lead to further delays and uncertainty. This mitigation strategy is fundamentally flawed and not allowed under CEQA. For operational impacts, the DEIR/DEIS identifies four discrete locations with significant visual impacts. For the large majority of the Proposed Project's 48 corridor miles, impacts will either be beneficial or less than significant. Nevertheless, the DEIR/DEIS imposes onerous mitigation measures across the entirety of the project. Simply put, this is not consistent with CEQA. Mitigation can only be required to reduce significant impacts and if this is applied, it must be limited in scope by having an "essential nexus" to the nature of the impact and be "roughly proportional" to the scale of the impact. SCE proposes removal of applicable mitigation measures in order to make the DEIR/DEIS compliant with CEQA.

**F1-3**

Lastly, SCE asserts that the renewable solar generation projects utilizing the West of Devers lines are more appropriately analyzed in the DEIR/DEIS as "cumulative impacts" rather than "connected actions." As explained in Section VIII, below, NEPA sets forth a specific test for determining whether or not projects should be considered "connected actions" for purposes of environmental analysis. Here, the renewable solar generation projects should be considered "cumulative impacts" not "connected actions," as per the NEPA standard.

**F1-4**

In addition to the general comments described herein, SCE has also prepared a detailed narrative demonstrating that the Phased Build Alternative does not meet the need for the WOD Upgrade Project, as well as a specific comment table specifically addressing various sections of the DEIR/DEIS. These documents are attached as Attachment A and B, respectively.

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**II. THE PHASED BUILD ALTERNATIVE DOES NOT MEET MOST OF THE PROJECT OBJECTIVES AND SHOULD BE REJECTED**

F1-5

**A. CEQA Requires Alternatives To Meet Most Of The Project Objectives**

CEQA requires an EIR to focus on alternatives that can eliminate or reduce significant environmental impacts while attaining most of the project objectives. CEQA Guidelines § 15126.6(a)-(b).

Case law recognizes using the applicant's project objectives to determine the reasonable range of alternatives. In *Sierra Club v. County of Napa*, 121 Cal. App. 4th 1490 (2004), the court upheld an agency's reliance on the project applicant's objectives both to narrow the scope of alternatives, and, ultimately, to reject some alternatives as infeasible. In *Sierra Club*, Beringer winery submitted an application to the County of Napa to develop a 1.4 million square foot winery. In proposing the project, Beringer identified several objectives related to expanding and consolidating its wine-making and warehousing facilities. *Id.* at 1496.

The County's EIR concluded that Beringer's project would have significant and unavoidable impacts on wetlands. The EIR analyzed six alternatives to the project, but eliminated three of the alternatives as infeasible for "not meeting Beringer's objectives." *Id.* The County then proceeded to approve Beringer's Proposed Project. Sierra Club challenged the approval, asserting that the project objectives were drawn too narrowly. The Court of Appeal upheld the County's approval, finding that "the project is the only feasible means of accomplishing Beringer's objective." *Id.* at 1508.

SCE is aware of case law supporting a lead agency's discretion to change an applicant's project objectives to ensure a full range of alternatives are analyzed in the EIR in order to reduce environmental impacts. *See, e.g., Save Round Valley Alliance v. County of Inyo*, 157 Cal. App. 4th 1437 (2007) (applicant's narrow project objectives could not be used to avoid consideration of alternative site with fewer environmental impacts). However, SCE is not familiar with any case where a lead agency eliminated an applicant's project objectives that were aimed at reducing environmental impacts and meeting regulatory standards, as is the case here.<sup>4</sup>

Specifically, for West of Devers, SCE identified six basic objectives:<sup>5</sup>

1. Allow SCE to meet its obligation to integrate and fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid.
2. Consistent with prudent transmission planning, maximize the use of existing transmission line rights-of-way to the extent practicable.

<sup>4</sup> It is important to note that the Phased Build Alternative fails to reduce environmental impacts while also failing to meet the project need, as described in more detail below.

<sup>5</sup> Proponent's Environmental Assessment, Section 1.3.

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3. Meet project need while minimizing environmental impacts.
4. Facilitate progress toward achieving California's RPS goals in a timely and cost-effective manner by SCE and other California utilities.
5. Comply with applicable Reliability Standards and Regional Business Practice developed by NERC, WECC, and the CAISO; and design and construct the project in conformance with SCE's approved engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects.
6. Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable.

In turn, the DEIR/DEIS identifies the following three "Basic Project Objectives"<sup>6</sup>:

- Basic Project Objective 1: To upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 megawatts (MW).
- Basic Project Objective 2: To support achievement of State and federal renewable energy goals.
- Basic Project Objective 3: To maximize the availability of remaining space in the corridor to the extent practicable, so future use of the corridor for additional transmission line upgrades is not precluded.

Accordingly, the DEIR/DEIS *eliminates* SCE's project objectives #3 (minimizing environmental impact), #5 (comply with reliability standards) and #6 (construct facilities in a timely and cost-effective manner, while minimizing service interruptions) and *narrows* objective #1 by focusing only on the first phase of solar generation projects instead of the reasonably foreseeable projects identified by SCE and the CAISO. The DEIR/DEIS does not explain the basis for eliminating objectives #3, 5 and 6, which are aimed at reducing environmental impacts and utility customer costs while maintaining reliability.

As described next, the Phased Build Alternative does not ensure that SCE's objectives #1, 3, 5 and 6 can be met. Furthermore, even if SCE's objectives are ignored, the Phased Build Alternative does not meet two out of the three "Basic Project Objectives" identified in the DEIR/DEIS.

**B. The Analysis Of The Phased Build Alternative Is Flawed**

As described in more detail in Attachment A, SCE believes that the technical analysis that led to the conclusion that the Phased Build Alternative met the Basic Project Objectives is severely

F1-5  
cont.

F1-6

<sup>6</sup> DEIR/DEIS, pp. A-11-A-14.

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flawed. There are numerous errors in the underlying assumptions, as well as the alleged capabilities of the Phased Build Alternative.

SCE believes that the Phased Build Alternative would likely require additional transmission elements such as a Remedial Action Scheme ("RAS") and 600 MVar of shunt capacitance, consisting of several smaller capacitor banks installed at multiple locations. These additional transmission elements were not analyzed for environmental or cost impact in the DEIR/DEIS, leading to a smaller scope and impact than the Phased Build Alternative would actually have.

Further, the ZGlobal studies used the CAISO's reliability base cases without making the necessary changes to the generation dispatch assumptions to determine delivery network upgrade is flawed and inconsistent with the CAISO's deliverability study methodology. The generation dispatch levels set by the CAISO in the Reliability base cases are intended to eliminate any network upgrades driven by the addition of new generation and only identify upgrades needed to serve the load forecast. For example, the CAISO's 2024 Reliability Base Case that was used to validate the DEIR/DEIS Phase Build Alternative limits Photovoltaic and Solar Thermal to 36% and Wind resources to 0% of its maximum capability. This low generation dispatch level is inadequate to identify delivery network upgrades needed to provide FCDS. Using the reliability base cases without accounting for the deliverability requirements of the generation that has executed agreements and that are in queue presents an inaccurate forecast of the actual system needs in the West of Devers corridor.

Additionally, as described in more detail in Attachment A, the ZGlobal studies inaccurately stated that the amount of generation that needs the WOD Upgrade Project for deliverability was 1,881 MW. This amount ignores 985 MW that are already interconnected and have Full Capacity Deliverability Status as a result of the Interim West of Devers Project, which will not provide any deliverability benefits once the WOD Upgrade Project is constructed.

**C. The Phased Build Alternative Does Not Meet Most Of SCE's Project Objectives**

As stated above, the Phased Build Alternative would not allow SCE to meet objectives #1, 3, 5 and 6. With respect to objective #1, as described in Attachment A to this letter, the Phased Build Alternative would limit the amount of new generation that could be interconnected and fully delivered. Only one of the Power Flow Cases analyzed by the DEIR/DEIS found the Phased Build Alternative to be feasible.<sup>7</sup> However, this Case limited the amount of generation that would be interconnected in the Blythe and Dessert Center areas to only 1,387 MW. This is far less than the 1,859 MW that already has executed interconnection requests requiring the WOD Upgrade Project for Full Capacity Deliverability Status ("FCDS") and completely ignores the remaining generation in queue. Currently there are 6,072 MW of generation in the CAISO queue that would all require the WOD Upgrade Project to support FCDS. While not all of that generation may ultimately develop, given that the total designated Renewable Resource Portfolio for Riverside East and the Imperial area (to meet the 33% renewable goal by 2024) is 4,767 MW, SCE believes that the Phased Build Alternative significantly limits the ability of renewable projects in those areas to be developed and have FCDS. In other words, for purposes of CEQA, it is reasonably foreseeable that some of the 6,072 MW of generation and in the CAISO queue will be developed, and it is *not*

<sup>7</sup> DEIR/DEIS, Appendix 5, Attachment 2, ZGlobal Case 3, pg. 10.

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cont.

F1-7

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reasonable to assume that none of this generation will be developed. This risk is accentuated by the passage of SB 350 and increasing the RPS to 50% by 2030, which will likely have the effect of spurring additional renewable generation.

With respect to objective #3, the Phased Build Alternative does not meet the Project need while minimizing environmental impact. As described in Section IV.B below, the Phased Build Alternative would lead to greater environmental impacts as future phases would be needed in the near term future.

With respect to objective #5, SCE believes that the Phased Build Alternative would require additional transmission upgrades not identified in the DEIR/DEIS that would need to be installed in order to alleviate reliability concerns.

Further, the Phased Build Alternative also does not meet objective #6. As described in Section III.B below, construction of the Phased Build Alternative would require extensive double-line outages, and potentially some triple- and quadruple-line outages, which may violate reliability criteria. The construction of additional phases would involve significant curtailment of generation that is already interconnected and delivering power.

Given the CEQA mandate that the Project Alternatives must meet and attain most of the project objectives, SCE cannot understand how the DEIR/DEIS could conclude that the Phased Build Alternative would meet the project objectives, either as stated by SCE or even in the reduced form as set forth in the DEIR/DEIS, as discussed next.

**D. The Phased Build Alternative Does Not Meet Two Of The Three “Basic Objectives” Identified In The DEIR/DEIS**

First, the Phased Build Alternative does not meet the DEIR/DEIS’s Basic Objective 1 to increase system deliverability by at least 2,200 MW. In the ZGlobal Study, only one case (Case 3) supported the 795 ACCR conductor as a feasible alternative conductor, and that case only adds a small fraction of the transmission capability needed to meet the renewable project deliverability needs of the Proposed Project. As further described in Attachment A, a detailed review of Case 3 indicates that it only assumed 1,387 MW of generation resources at Red Bluff and Colorado River Substations. Today, there is already 1,050 MW of generation in service at Red Bluff and Colorado River Substations.<sup>8</sup> Therefore, based on Case 3, there would only be 337 MW of additional new resources that could be developed at both Colorado River and Red Bluff Substations, significantly less than the 1,929 MW<sup>9</sup> with executed generator interconnection agreements at this time and significantly less than the Basic Objective 1 minimum deliverability requirement. Moreover, Case 3’s assumption of only 337 MW of new generation at Colorado River and Red Bluff Substations significantly downplays the importance of both the Colorado River and Red Bluff Substations for

<sup>8</sup> The WOD upgrade has been identified by CAISO and SCE as a required Delivery Network Upgrade for generation projects located Colorado River and Red Bluff Substations. The Colorado River and Red Bluff Substations are designed to interconnect renewable developments in the Blythe and Desert Center areas. The flow from Colorado River and Red Bluff Substations ultimately flow through the WOD corridor.

<sup>9</sup> The 1,929 MW consist four projects (Q294, 365, 576, and 643AE), totaling 1,359MW, require the WOD upgrades for FCDS and two projects (Q17 and 219) totaling 570MW that would increase the flow on the WOD corridor.

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F1-8

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interconnecting new renewable resources. It is reasonably foreseeable, indeed, even highly likely, that there will be more than 337 MW of new generation connecting at Colorado River and Red Bluff Substations. Given the reasonable foreseeability of such generation, it is improper under CEQA and NEPA to exclude this generation in the development of an alternative to the project.

F1-8  
cont.

The Phased Build Alternative<sup>10</sup> was assumed to provide 3,000 MW of deliverability. This assumption was not supported by any study performed by ZGlobal. To determine the actual MW of deliverability provided by the Phase Build Alternative, a deliverability study is needed consistent with the CAISO's deliverability study methodology. Since ZGlobal's Case 6 determined that the use of the 795 ACCR conductor would limit the flow through the West of Devers corridor to 1,900 MW due to system instability and excessive reactive power losses, SCE believes that the use of 795 ACCR conductor could introduce a new bottleneck that would limit the MW of deliverability. This would ultimately lead to a project that does not maximize the use of this critical transmission corridor.

These flaws highlight the error in developing an entirely new alternative based on a third-party analysis before SCE is given a chance to review and critique the analysis and cross-examine its preparers in the case-in-chief. ZGlobal's analysis is fatally flawed and does not adequately evaluate system needs and cannot be relied upon for transmission planning purposes or to determine the scope of the Proposed Project. At a minimum, the DEIR/DEIS needs to clarify that the system planning assessment underpinning the Phased Build Alternative is preliminary and untested and may change following the case-in-chief testimony. SCE believes that upon such scrutiny, the Phased Build Alternative will be shown to be far inferior in its ability to deliver incremental renewable energy.

Second, the Phased Build Alternative does not meet Basic Project Objective 2: to support achievement of State and federal renewable energy goals because the Phased Build Alternative would significantly limit the corridor transfer capability. SCE's review of the ZGlobal studies found that the Phased Build Alternative would limit the corridor transfer capability to approximately 1,900 MW.<sup>11</sup> As President Picker recently stated, "long-standing state policies incorporated as the Garamendi Principles call for expanding transmission within existing corridors."<sup>12</sup> Here, the Phased Build Alternative conflicts with that policy, as it limits the corridor capacity. As a result of limiting the corridor capability, the Phased Build Alternative would purposely introduce a barrier to the achievement of State and federal renewable energy goals. Given that West of Devers is a critical corridor for renewable developments in the Riverside East and Imperial Valley areas, the Phased Build Alternative would become a barrier for future renewable generation development in these areas to achieve deliverability. The total designated Renewable Resource Portfolio for Riverside East and Imperial zones to meet 33% by 2024 is 4,767MW as identified in the Revised 2015-2016 Renewable Portfolios Transmittal Letter.<sup>13</sup> The Phase Build Alternative would become a barrier to facilitate SCE's and other California utilities' requirement of achieving and maintaining California's 33% Renewable Resource Portfolio. This

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<sup>10</sup> DEIR/DEIS Appendix 5, page Ap. 5-48.

<sup>11</sup> ZGlobal Case 6 Study, Appendix 5, Attachment 2, pg. 12.

<sup>12</sup> Concurrence of Commissioner Picker, D.15-05-004.

<sup>13</sup> <http://www.caiso.com/planning/Pages/TransmissionPlanning/2015-2016TransmissionPlanningProcess.aspx>.



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limitation of the Phased Build Alternative and its inability to meet Basic Project Objective 2 is magnified by the passage of SB 350, which increases the RPS to 50% by 2030.

**III. THE PHASED BUILD ALTERNATIVE IS NOT FEASIBLE UNDER CEQA AND SHOULD BE REJECTED**

CEQA defines “feasible” as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors.<sup>14</sup> Based on this definition, the Phased Build alternative is not feasible under CEQA because it cannot be accomplished in a successful manner within a reasonable period of time, taking into account:

- Technology constraints with the 795 ACCR conductor (as opposed to the 1590 ACSR conductor proposed by SCE). The unique wire stringing limitations of the 795 ACCR conductor would require SCE to expand the sizes of currently planned wire stringing sites and to add new sites. These sites may need to be located within environmentally sensitive areas not previously analyzed, or outside of the ROW, potentially resulting in the need for purchase or condemnation of property.
- Legal and economic constraints that limit the feasibility of assuming multiple outages required for the Phased Build Alternative. Based on SCE’s experience, it is not likely that the CAISO would approve extended double-, triple- or quadruple-line outages on the West of Devers lines for the Phased Build Alternative. However, even if CAISO did approve such outages, it would lead to substantial generator curtailment, causing significant economic loss to generators currently connecting to the West of Devers lines.
- Regulatory constraints associated with the Phased Build Alternative’s assumption that subsequent corridor upgrades can be completed “just in time” to meet increased demand. The time required to obtain new approvals from the CPUC and BLM may make it infeasible to construct upgrades to the Phased Build Alternative in time to meet system deliverability requests, creating a major potential risk to reliability. This risk is accentuated by the passage of SB 350 and increasing the RPS to 50% by 2030, which will likely have the effect of spurring additional renewable generation.
- Environmental constraints caused by the increased environmental impacts from the Phased Build Alternative, which will require SCE to remobilize construction efforts multiple times over subsequent phases to achieve what could have been accomplished in a single, coordinated construction effort contemplated by the Proposed Project, resulting in extended disturbance periods, reduced efficiencies and greater impacts.

The following subsections and Section IV describe each of these constraints in more detail and additional information is included in our broader comments. In short, even if some constraints can be minimized or avoided, the combination of feasibility constraints results in a conclusion that

<sup>14</sup> Public Resources Code § 21061.1; CEQA Guidelines § 15364.

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F1-10



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the Phased Build Alternative cannot be successfully completed in a reasonable period of time. For these reasons, the Phased Build Alternative is not a feasible option under CEQA and should be rejected.

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cont.

**A. Construction of The Phased Build Alternative May Be Technically Infeasible**

The DEIR/DEIS did not take into account critical construction factors that render the Phased Build Alternative significantly more difficult, and potentially infeasible, to construct. Because these construction constraints are potentially insurmountable, SCE cannot say with certainty that the Phased Build Alternative can be safely constructed in the West of Devers corridor. SCE, therefore, asserts that the Phased Build Alternative is not feasible due to construction constraints, as described in more detail below.

The Phased Build Alternative specifies the use of 795 ACCR conductor as opposed to the 1590 ACSR ("Aluminum Conductor Steel Reinforced") conductor proposed by SCE for the Proposed Project. According to 3M, the manufacturer of 795 ACCR conductor,<sup>15</sup> there are specific maximum allowable bending angles that cannot be exceeded when pulling ACCR conductor.<sup>16</sup> In contrast, the bending constraints for the 1590 ACSR conductor proposed by SCE, are significantly less restrictive.<sup>17</sup> The practical effect of this difference is that SCE's Proposed Project allows constructing wire sites (the large footprint temporary sites needed to station conductor reels and pulling equipment) at a much greater angle from the path of the transmission line being constructed. These greater angles are not possible when using the less flexible 795 ACCR conductor proposed in the Phased Build Alternative. This technical difference has major environmental consequences that are completely ignored in the DEIR/DEIS.

In order to safely construct the Phased Build Alternative in the West of Devers corridor, SCE would need to establish new wire sites and/or expand proposed wire sites to accommodate wire stringing of 795 ACCR conductor. The corridor traverses rugged terrain, and several residential communities have been developed adjacent to the corridor, limiting prospective real estate available for stringing setup areas. There are very few locations where SCE could site additional pulling and tensioning locations to support the installation requirements of the 795 ACCR conductor without conducting extensive grading or locating wire sites outside the existing ROW.

SCE was well aware of the ROW constraints when it planned the Proposed Project. The wire sites were carefully chosen so as to minimize earth moving, disturbance to residents, disturbance to jurisdictional waterways, critical habitats and condemnation of residential parcels. Preliminary examination of the Phased Build Alternative indicates that SCE would be required to redesign the wire stringing plan to support stringing of 795 ACCR conductor to assure pulling

<sup>15</sup> Manufacturer 3M is referenced in Appendix 5 to the DEIR/DEIS as the manufacturer of the 795 ACCR conductor.

<sup>16</sup> 3M website at <http://multimedia.3m.com/mws/media/5858200/3m-accr-installation-maintenance-guidelines.pdf>.

<sup>17</sup> *IEEE Guide to the Installation of Overhead Transmission Line Conductors*, IEEE Std. 524 -2003, The Institute of Electrical and Electronics Engineers, Inc., March 12, 2004.

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angles are maintained within manufacturer recommendations. Revisions to the wire stringing plan would include modifications to existing and new wire sites. These wire sites could be located in environmentally sensitive areas and/or require additional rights outside of the current ROW that could require condemnation. Without completing a new wire stringing plan that fully evaluates the physical topography of the corridor, the location of the new and existing towers, and the wire stringing angle limitations of the conductor, SCE cannot establish the feasibility of installing 795 ACCR conductor as an alternative to 1590 ACSR conductor. Even if it is feasible to relocate wire sites within areas suitable to limit wire stringing angle to within the manufacturer's specification, the environmental effects of such relocations need to be acknowledged. The DEIR/DEIS not only fails to assess the feasibility of construction with the different conductor type, it also fails to analyze or acknowledge the significant environmental impact thereof.

F1-10  
cont.

### **B. Legal and Economic Constraints Limit The Feasibility Of Multiple Outages Required By The Phased Build Alternative**

F1-11

The Phased Build Alternative would require multiple outages of the currently existing West of Devers 220 kV transmission lines, over a significant period of time. The current West of Devers corridor contains four 220 kV circuits. In order to safely upgrade or make changes to that corridor, some of these existing lines must be de-energized. De-energizing circuits is commonly referred to as taking an outage. Because the four circuits in the West of Devers corridor are currently operating at full capacity, SCE designed the construction plan for the Proposed Project specifically to limit the amount and duration of required outages consistent with SCE's Basic Project Objective #6. More importantly, the Proposed Project construction plan limits both the number of double-line outages (de-energization of two circuits at one time) and the duration of such outages. SCE could safely construct the Proposed Project while limiting any required double-line outages to less than 24 hours in duration. In contrast, in order to safely construct the Phased Build Alternative, SCE would need to take multiple double-, and possibly triple- or quadruple-line, outages of up to six months in duration.<sup>18</sup> This means that for up to six months at a time, multiple times during the four-plus-year construction schedule, two or more of the four circuits in the West of Devers corridor would be out of service.

SCE does not control when outages are allowed, as the scheduling of outages is solely within the jurisdiction of the CAISO. As SCE explained in response to the Energy Division's data request questions ALT-17A and ALT-17B, however, SCE suspects that the CAISO is not likely going to approve extended double-, triple- or quadruple-line outages on the existing West of Devers lines due to the negative system impacts such extended and significant outages would cause. However, even if CAISO did approve such outages, it would lead to significant generator curtailment, causing significant economic loss to those generators currently connecting to the West of Devers line and would not meet SCE's Basic Project Objective #6. If the Phased Build

<sup>18</sup> The Phased Build Alternative requires, in part, stringing conductor on existing towers, whereas the Proposed Project requires stringing conductor on new towers. With minor exceptions, the Proposed Project design placed the new towers in such a location that the construction could proceed without having to de-energize more than one of the four existing 220 kV circuits for long periods of time. Because the Phased Build Alternative requires stringing conductor on currently existing towers, that alternative will require additional outages. Furthermore, the bending angle constraints of the Phased Build Alternative limit the placement of wire sites, such that more outages will be required in order to maintain clearance for safe construction.

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Alternative were constructed, the curtailment impact of the line outages would be even further magnified for future phases of construction on the West of Devers lines. In that scenario, when subsequent upgrades are required, the corridor would be further loaded, leading to even more curtailment when subsequent construction double-, triple- or quadruple-line outages would be required. These costs limit the economic feasibility of the Phased Build Alternative.

F1-11  
cont.

### C. The Phased Build Alternative Is Infeasible From a Regulatory Perspective

The time required to obtain new approvals from the CPUC and BLM may make it infeasible to construct upgrades to West of Devers in time to meet system deliverability requests, creating an inability to meet the interconnection requirements for renewable projects which may be required to meet RPS goals. The Phased Build Alternative is premised on a dubious assumption that new phases can be constructed “just in time” as new demand materializes. The DEIR/DEIS simply states that “future phases” under the Phased Build Alternative will be constructed “as generation projects become certain and capacity is clearly required.”<sup>19</sup>

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This gloss belies the complexity involved with building new transmission infrastructure in California – a process driven by multi-year planning cycles at the CAISO and CPUC, an extended environmental review and approval process, and a construction schedule often extended due to environmental factors such as nesting birds. The DEIR/DEIS fails to analyze the feasibility of achieving the upgrades in a reasonable period of time, particularly if needs develop faster than the DEIR/DEIS assumes.

The DEIR/DEIS does not address *which* agency will determine that “capacity is clearly required” (i.e., whether the CAISO who already found the need to exist, or the CPUC will also determine system need?), *in what proceeding* this determination will be made (i.e., as part of the CAISO’s Transmission Planning Process, or a new CPUC proceeding focused on transmission planning and forecasting?), or whether this determination *will be made early enough* to ensure that SCE has time to prepare an application (which will require extensive environmental studies and engineering design), complete the CEQA/NEPA review, obtain all necessary approvals and complete construction in the challenging corridor before the new demand is online.

CPUC staff has acknowledged that it can take four to nine years to prepare an application, permit and construct a new transmission line.<sup>20</sup> Using the West of Devers Project as an example, SCE filed its CPUC Application in October 2013 and under the current pace, a decision is not likely until 2016, which is well over 2 years since the application was filed. Taking into account engineering, environmental studies and time to develop the PEA, it will have been 4 years prior to even getting a decision on the project, let alone the approximately 48-months minimum it is anticipated to take to build the project. Even assuming upgrades are not needed until 2024 as indicated in the DEIR/DEIS (“it may be 10 years [i.e., by 2024] before additional upgrades are

<sup>19</sup> DEIR/DEIS, p. C-25.

<sup>20</sup> CPUC, “Processes for Planning and Permitting Electric Transmission Projects in California,” (Oct. 2011), available at <http://www.cpuc.ca.gov/NR/rdonlyres/6d4D8AA9-CF49-4194-A4C6-DE394317E46B/0/CPUCSidesFresnoAssemblyComTransmissionOct242011.pdf>, Slide 7.

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needed”),<sup>21</sup> SCE would have to begin the application and PEA *years in advance, before 2020*, given the following estimated timelines:

- Approximately 6 to 12 months to update environmental studies for the PEA, including for biological and cultural resources;
- Approximately 9 to 12 months to prepare the PEA, engineering design and application;
- Approximately 18 to 30 months to obtain approvals from the CPUC and, if needed, BLM, including the environmental review and public involvement process, which makes timing difficult to predict because areas of controversy can substantially extend the process; and
- Approximately 48 months or more to complete construction, resulting in a total time period of approximately **7 to 9 years**.

Based on this timing, the Phased Build Alternative would require SCE to re-start the application process to upgrade West of Devers to meet needs in 2024 well before the end of 2022, which is the earliest this alternative project could be operational. In other words, the alternative creates a “do loop” where SCE must re-start the permitting process for the next phase, before the first phase is even energized. Even if the CPUC and BLM could support such a rapid re-start, let alone allow SCE to conduct its environmental studies and engineering on a future not yet completed base line, it is far from clear that SCE could obtain other agency approvals in a timely manner (e.g., endangered species take coverage) or satisfy other obligations. And if needs materialize before 2024, the likelihood of completing the upgrades in time becomes even less tenable.

Taken as a whole, it is simply not feasible under the current regulatory framework to assume the West of Devers Upgrade Project can be re-permitted to accommodate subsequent upgrades needed by 2024 or earlier.

### IV. THE PHASED BUILD ALTERNATIVE DOES NOT REDUCE ENVIRONMENTAL IMPACTS COMPARED TO THE PROPOSED PROJECT

#### A. By “Chopping Up” Or “Segmenting” The Project, The DEIR/DEIS Ignores The Environmental Impacts Of The Whole Of The Action, Which CEQA And NEPA Prohibit

CEQA requires an analysis of the “whole of an action, which has the potential for physical impact on the environment.” CEQA Guidelines § 15378(a). In other words, CEQA prohibits a lead agency from “chopping up” a single project into smaller individual subprojects to avoid responsibility for considering the environmental impact of the project as a whole. *Orinda Ass’n v. Board of Supervisors*, 182 Cal. App. 3d 1145, 1171 (1986); *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonoma*, 155 Cal. App. 4th 1214, 1223 (2007) (CEQA “cannot

<sup>21</sup> DEIR/DEIS, p. C-25.

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cont.

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be avoided by chopping up Proposed Projects into bite-sized pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial.”). This is often referred to as a prohibition against “piecemealing” a larger project.

In the seminal case of *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal. 3d 376 (1988), the California Supreme Court set aside an EIR for failing to analyze the impacts of a reasonably foreseeable multi-phase project. The case involved a plan by the University of California to move its school of pharmacy to a new building, of which only about one-third was initially available. *Id.* at 393. The EIR acknowledged that the school would eventually occupy the remainder of the building, but the EIR only discussed the environmental effects relating to the initial move. *Id.* at 396. The court concluded that the EIR should have analyzed both phases. *Id.* at 399. In so holding, the court announced the following test: “[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” *Id.* at 396.

NEPA has a similar prohibition against “segmenting” a project to avoid full environmental review. *See, W. Radio Servs. Co. v. Glickman*, 123 F.3d 1189, 1194 (9th Cir. 1997) (“NEPA prevents an agency from illegally segmenting projects in order to avoid consideration of an entire action’s effects on the environment”).

The DEIR/DEIS does exactly what CEQA and NEPA prohibit by “chopping up” or “segmenting” the Proposed Project to focus solely on an initial phase instead of the whole of the action. The DEIR/DEIS does this by creating an artificially narrow “Basic Project Objective 1” designed to “increase system deliverability by at least 2,200 MW,” which the DEIR/DEIS acknowledges covers only “the *initial* group of 5 solar power generation projects that was planned.”<sup>22</sup>

However, as explained in Section II, above, Basic Project Objective 1 improperly ignores subsequent upgrades that are reasonably foreseeable to occur, and, indeed, are very likely to occur in the near term. The reasonable foreseeability of future generation is made even more likely when viewed through the lens of recent policy developments that will encourage renewable generation in California. On January 5, 2015, Governor Brown announced a goal to increase California’s Renewables Portfolio Standard to 50% by 2030, and on April 29, 2015, Governor Brown issued Executive Order B-30-15, establishing statewide greenhouse gas reduction targets of 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050. The 50% RPS was recently codified into law with the passage of SB 350. Further, the California Air Resources Board has relied heavily on increasing renewable generation as a key goal for achieving greenhouse gas reductions. In addition, on September 26, 2014, the DEIR/DEIS for the Desert Renewable Energy Conservation Plan (“DRECP”) was released, advancing plans to facilitate development of renewable resources within the DRECP area. Furthermore, the Commission itself in conjunction with the California Energy Commission have recently begun the process to establish a Renewable Energy Transmission

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<sup>22</sup> DEIR/DEIS, p. A-11.

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Initiative (“RETI”) 2.0 initiative that describes the *inevitable* need for more transmission infrastructure to meet these State policy goals.

The DEIR/DEIS’ approach to Basic Project Objective I is analogous to the EIR that was overturned in *Laurel Heights*, where the lead agency inappropriately focused on only the initial phase of a multi-phase project. Instead, the DEIR/DEIS should evaluate the deliverability need identified by the Proposed Project, which constitutes the whole of the action.

The Phased Build Alternative is a false solution because it only purports to satisfy the narrow system deliverability needs identified in Basic Project Objective 1, while recognizing that “future phases” “would be implemented as generation projects become certain and capacity is clearly required.”<sup>23</sup> The DEIR/DEIS’ attempt to rationalize a piecemeal approach is that “it may be 10 years [i.e., by 2024] before additional upgrades are needed.”<sup>24</sup> This assumption is wrong on multiple fronts.

First, it is not accurate that additional upgrades will not be needed until 2024. The ZGlobal report relied upon by the DEIR/DEIS shows significant reliability violations in the 2019 “Cluster 7” scenario, which includes projects that will rely on the WOD Upgrade Project to achieve full deliverability. In other words, the Phased Build Alternative does not even fully meet the deliverability needs of projects slated to come online at the time the Proposed Project becomes operational, let alone meet the needs of subsequent future projects. For an additional critique of this assumption, see Section III.C.

Second, even assuming the DEIR/DEIS is correct that additional upgrades are not needed until 2024, the Phased Build Alternative fails to account for the fact that, as proposed, the first phase of this alternative would not be operational until the end of 2022 at the earliest, a mere 2 years before a “future” need date for a second phase beginning sometime in 2024. Because it can take years to prepare an application and obtain final approval from the CPUC and BLM,<sup>25</sup> SCE would be forced to submit an application for upgrades needed in 2024 while the project is under construction. See Section V, below, for more discussion of the risks of regulatory delays.

In short, the Phased Build Alternative would force a “do loop” of environmental review by segmenting the analysis into two or more separate environmental review cycles instead of a single document, which is not permitted by CEQA or NEPA. The DEIR/DEIS’s approach of relying on a second phase to handle the reasonably foreseeable system need as a way to justify not building the entire project now, but then ignoring the second phase for purposes of environmental review is not only internally inconsistent, it is impermissible under CEQA and NEPA. While some future

<sup>23</sup> DEIR/DEIR/DEIS, p. C-25. “Future phases” could include: “Reconductor the newly constructed 220 kV structures with higher capacity conductors; Replace the retained 220 kV structures with new, stronger 220 kV structures in order to carry heavier, higher capacity conductors; Install a single- or double-circuit 500 kV or 220 kV line in the vacant space remaining in the ROW.” *Id.*

<sup>24</sup> *Id.*

<sup>25</sup> CPUC staff has indicated that it can take four to nine years to prepare the application, permit and construct a new transmission line. See CPUC, “Processes for Planning and Permitting Electric Transmission Projects in California,” (Oct. 2011), available at <http://www.cpuc.ca.gov/NR/rdonlyres/6D4D8AA9-CF49-4194-A4C6-DE394317EA6B/0/CPUCSidesFresnoAssemblyComTransmissionOct242011.pdf>, Slide 7.

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upgrades may not be well enough defined to be fully analyzed (e.g., the possibility of a new 500 kV line), it is *simply not correct* that no upgrades beyond the bare minimum needed to meet the initial phase are reasonably foreseeable. Therefore, to comply with CEQA and NEPA, the evaluation of the Phased Build Alternative must, at a minimum, be revised to address not just Basic Project Objective 1, but all reasonably foreseeable upgrades needed to meet system deliverability requests.

F1-13  
cont.

**B. Phased Build Alternative Would Result In Greater Environmental Impacts Than The Proposed Project**

F1-14

The segmented approach of the Phased Build Alternative actually results in *greater environmental impacts* than the Proposed Project because it does not meet the system need. As such, it will force an additional project in the near-term to then meet the system need, thereby requiring multiple rounds of construction activities, possibly in short succession, prolonging the duration of noise and air pollutant exposure, while increasing land disturbance and associated impacts. In addition, the Phased Build Alternative requires additional construction impacts that are not required to construct SCE's Proposed Project.

**1. The Phased Build Alternative Would Cause Additional Impacts Necessary for Wire-Stringing Operations**

The DEIR/DEIS erroneously concluded that the environmental impact of the Phased Build Alternative will be less than those associated with SCE's Proposed Project. The assumption that the re-use of existing 220 kV double circuit structures for use with 795 ACCR would be less impactful than replacement of the 220 kV structures for use with 1590 ACSR fails to take into account numerous construction and other negative environmental impacts that will be caused by the Phased Build Alternative. It is clear that this assumption was made in the DEIR/DEIS without completing a full analysis of all that would be required in order to reuse towers with the 795 ACCR conductor, as well as the numerous feasibility issues associated with construction.

As discussed above, the Phased Build Alternative will require SCE to expand currently planned wire sites and to add new sites. While SCE has not completed its full analysis of all the additional wire sites that would be necessary, initial review has identified a significant number of additional wire sites would be required to construct the Phase Build Alternative. These additional wire sites would cause added disturbance and environmental impact that is not anticipated by the construction of the Proposed Project. In addition, due to the wire-stringing bending constraints of the 795 ACCR conductor, the wire-stringing sites planned for SCE's Proposed Project would need to be expanded to reduce the break-over angle. Expansion of these sites, where feasible, would result in additional disturbance area, a significant expansion of civil upgrades, and the potential for impacting sensitive species. The additional sites, as well as the expansion of sites, would significantly increase the overall project disturbance area and would result in additional noise, dust, visual, and other resource area impacts, as explained in the comment table.



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**2. The Phased Build Alternative Results in Towers That Will Not Be Aligned Which Can Lead to Conductor Blow-out And Increased Visual Impacts**

F1-15

Re-use of existing structures and construction of new structures, as called for in the Phased Build Alternative, will result in structures that will not line up in the ROW next to each other. In contrast, the Proposed Project pairs the new set of structures adjacent to each other (to the extent feasible) in order to minimize the visual impact of the structures and to achieve matched spacing between structures and lengths of conductor (commonly referred to as “spans”). Although the design of the Phased Build Alternative leads to additional visual impacts as compared to the Proposed Project, the DEIR/DEIS does not contain any visual simulations of the Phased Build Alternative, and as such, the public has not been provided with the opportunity to review and comment. This is a serious concern, as the Phased Build Alternative would result in towers that are not aligned and most likely more structures in the West of Devers corridor than the Proposed Project. In addition, the difference in conductor spans between the two adjacent lines could also create the potential for conductor contact between circuits and/or structures due to conductor sway during windy conditions (technically referred to “blow-out”).

In order to eliminate the potential blow-out impact resulting from new and existing structures that are offset and do not have similar conductor spans, SCE would need to add additional structures on both the existing and new tower lines. Moreover, it may not be feasible to locate adequate additional structures to mitigate the impact of offset structures and mismatched conductor spans. Assuming additional structures could be installed, this scope of work would significantly increase the overall project disturbance area and would result in additional noise, dust, visual, and other resource area impacts as explained in the comment table. The impact of these additional structures were not even considered – much less, fully analyzed – in the DEIR/DEIS.

**V. THE PHASED BUILD ALTERNATIVE IS NOT COST-EFFECTIVE AND WOULD DELAY THE PROJECT'S IN-SERVICE DATE**

F1-16

Based only on conceptual and speculative information, the DEIR/DEIS asserts that the Phased Build Alternative would have a reduced construction timeframe and would cost less than SCE's detailed, fully-planned Proposed Project. This analysis incorrectly dismisses the overall delay the Phased Build Alternative would cause to the project's in-service date and understates the necessary project scope elements, additional design and engineering work, new procurement and testing efforts and construction requirements in order to actually build the Phased Build Alternative.<sup>26</sup> SCE has not had sufficient time to develop a cost estimate for the Phased Build Alternative and cannot say with certainty that the cost to construct the Phased Build Alternative would be more or less than the cost to construct SCE's Proposed Project. SCE will continue to work through the missing scope elements to better understand the impact to the construction cost.

<sup>26</sup> The DEIR/DEIS also ignores several SCE responses to Energy Division data requests in which SCE explained how alternatives that either reuse a portion of the existing double circuit 220 kV structures or move any new 220 kV structures closer to the center of the ROW would create many construction challenges and result in an overall delay to the project of at least 12 to 24 months. See, for example, SCE's responses to Data Request Numbers ALT-14, ALT-15A, ALT-15B, ALT-15C, ALT-17A, and ALT-17B.



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Beyond the missing and understated scope elements for the Phased Build Alternative, the DEIR/DEIS cost assertion is flawed because it erroneously compares the cost-effectiveness of SCE's Proposed Project (with full capacity) against the much lesser capacity of the Phased Build Alternative, without taking into account the cost of the necessary next phase of the latter project needed to get the equivalent capacity, in order to make an "apples to apples" comparison. A simply analogy makes this clear: if we need to build a two story building, but decide today to build just the first story and then build the second story two years later, it is inaccurate to compare the cost of building just the first story to what it would cost to build both stories at one time—the valid analysis must compare the cost of a two-story building built over two years to the equivalent two-story building built all at once. It is hard to foresee a situation where the two-phased build out results in a lower cost than the Proposed Project, and SCE will evaluate this in more detail as it prepares for testimony in the case-in-chief. For these reasons, and as described in more detail below, the Phased Build Alternative is not cost-effective and would take longer to complete as compared to SCE's Proposed Project.

**F1-16  
cont.**

The DEIR/DEIS failed to accurately account for electrical and construction limitations associated with the Phased Build Alternative's 795 ACCR conductor. These limitations increase the scope of the project, thereby increasing the schedule and the costs. First, based on the electrical limitations, and as recognized by the study prepared by ZGlobal, a Special Protection System and 600 MVar of shunt capacitance would be needed for this project. Both of these elements are unaccounted for in the Phased Build Alternative's conceptual scope and would result in additional time and costs. Second, there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS:

**F1-17**

- the need for interset structures to mitigate the potential of conductor sway or blow-out associated with mismatched conductor spans;
- the need for additional temporary structures and wire to minimize the need for line outages;
- the addition of new and expansion of proposed wire sites;
- the need for additional mobilization and demobilization of construction crews and additional environmental monitoring made necessary by more difficult outage requirements.

These added construction requirements would necessitate additional costs and would also cause delays to the project schedule, resulting in additional project management and project support costs.

SCE sought further information from the Energy Division regarding the schedule and cost assumptions included in the DEIR/DEIS, and the Energy Division was only able to provide limited information. Notwithstanding the assumptions that were not provided, the Energy Division did include a few assumptions that must be addressed. The Energy Division's response correctly assumes that there would be a reduction in labor costs associated with removing fewer of the existing 220 kV structures, as well as labor and material cost savings associated with constructing fewer new 220 kV structures. The Energy Division's response also correctly assumes that the 795 ACCR conductor is significantly more costly than the Proposed Project's conductor (double-bundle 1590 ACSR conductor), however, it fails to calculate the impact of the difference. Based on limited research, the 795 ACCR conductor seems to be approximately 4-5 times as costly as 1590 ACSR conductor. Taking into account the assumption that the Phased Build Alternative would require

**F1-18**

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approximately 45% less conductor (single vs. double-bundle), the conductor costs for the Phased Build Alternative would still be significantly more than that for the Proposed Project.

**F1-18  
cont.**

The Energy Division's response, then, implausibly asserts that the labor cost for conductor installation would be 35 to 40% less than conductor installation for the Proposed Project, based on the assumption that installing a single conductor takes less time to install than a double-bundle conductor. This conclusion is flawed, as the construction limitations associated with a more limited bending angle for the 795 ACCR conductor would actually increase the labor cost for installing this conductor. Furthermore, pulling single conductor has no real labor savings as compared to double-bundle conductor because the "double-bundle" is pulled together, not separately, and single conductor cannot be pulled faster.

In addition to the increased labor cost to install the 795 ACCR conductor, there would be additional costs associated with the wire-pulling equipment that would be needed, as well as potentially increased costs for the line hardware materials used to attach the conductors to the transmission structures. These costs do not appear to be reflected in the Energy Division's assumptions.

Lastly, the Energy Division's response asserts there would be a cost savings from eliminating the need for the subtransmission scope, as the Phased Build Alternative assumes that there would be sufficient space to pull the new conductor through Segment 1 without relocating the subtransmission lines.<sup>27</sup> Therefore, this presumed savings may not actually be realized.

The DEIR/DEIS correctly recognizes that the 795 ACCR conductor has higher electrical losses when compared to the electrical losses of the Proposed Project conductor. In this same general discussion, the DEIR/DEIS asserts that electrical losses have an economic consequence, but those consequences do not appear to be accounted for in asserting that the Phased Build Alternative would be less costly than SCE's Proposed Project. SCE has started to analyze the cost of electrical losses. Early indications suggest that these electrical losses are not trivial and could reach into several millions of dollars per year more for the Phased Build Alternative than for the Proposed Project.

**F1-19**

As explained in SCE's responses to data requests, the Phased Build Alternative would require additional design and engineering work, additional conductor procurement and testing, and cause construction delays that would extend the overall project in-service date by approximately two years. This delay would increase the costs of the Phased Build Alternative associated with extended project management, project support and environmental compliance. Additional costs could also be identified after the necessary design and engineering is completed, in order to get to an equivalent engineering level and scope definition as the Proposed Project. If the necessary engineering and scope definition is not completed until after the Commission's decision is issued and the Phased Build Alternative is subsequently found to be infeasible or requiring further environmental review, SCE would have to re-open the CPCN process through a petition for modification to request the changes needed to make it constructible and/or environmentally-

**F1-20**

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<sup>27</sup> SCE's Proposed Project called for the removal and relocation of two miles of 66 kV subtransmission lines to make space in the West of Devers corridor for the upgraded and relocated 220 kV transmission lines.

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compliant. This could add up to an additional 12 months of delay further impacting cost and schedule.

The flaw in the assertion that the Phased Build Alternative is less costly than the Proposed Project is most apparent in the failure to conduct a comparable cost-effectiveness analysis, taking into account costs and differences in capacity. In comparing economic projects or even policy-driven projects, it is standard to develop a cost-effectiveness analysis that includes capacity. In this case, the use of double-bundle 1590 ACSR conductor provides substantially more capacity compared to the 795 ACCR conductor. Based on this simplifying fact, and not factoring into account other project-driven costs such as the cost of electrical losses, the construction cost of the Phased Build Alternative would need to be substantially less than the construction cost of the Proposed Project in order to conclude that the Phased Build Alternative is less costly than the Proposed Project. SCE asserts that based on its high-level understanding of the scope of the Phased Build Alternative, this is not the case.

The phased-approach of the Phased Build Alternative would result in greater overall costs, impacts, and risks. A phased-approach is less efficient than the single, coordinated construction effort contemplated by the Proposed Project, as it would result in duplicating many activities, which exacerbates the environmental impacts and overall costs. Examples include repeating environmental studies, engineering studies, licensing activities, and having to effectively construct twice. A phased-approach also interjects additional risks that can be significant. A lower transfer capability would limit the network's ability to meet deliverability requirements of generators, increase system constraints, and cause other potential system problems, all of which could result in even greater costs to ratepayers.

For all of the reasons stated above, the DEIR/DEIR should state that although the Phased Build Alternative would result in some schedule and cost reductions associated with removing and installing fewer 220 kV structures, the Phased Build Alternative does not meet SCE's Project Objectives #4 and #6 because it would delay the project's in-service date and would not be as cost-effective as the SCE's Proposed Project, due to other scope elements of the Phased Build Alternative, a much smaller increase in transfer capability, and the fact that the next phase would result in another round of design, engineering, licensing, construction and environmental costs and impacts.

**V1. THE REQUIREMENT TO OBTAIN A VARIANCE FROM LOCAL JURISDICTIONS FOR NOISE IMPACTS SHOULD BE STRICKEN OR REVISED**

The DEIR/DEIS concludes that the Proposed Project will result in a significant and unavoidable impact from construction noise (Impact N-1). Mitigation Measures N-1a and N-1b would reduce the impact, but it would remain significant and unavoidable.

SCE requests clarification of additional language in the DEIR/DEIS regarding local agency variances for certain construction activities. Specifically, the DEIR/DEIS states:

With implementation of the recommended mitigation measures, the construction activities would either comply with local noise

**F1-20  
cont.**

**F1-21**

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*ordinances, or SCE would request a variance from each affected jurisdiction. SCE would similarly request a variance if there is a need to work outside of normal daytime, weekday hours.*<sup>28</sup>

Similarly, Mitigation Measure N-1a provides in pertinent part:

*Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction.*<sup>29</sup>

The CPUC has made clear that regulated public utilities are not required to obtain local agency discretionary approvals related to the construction of major transmission lines such as the Proposed Project, including local noise variances. For example, in the CEQA Findings of Fact for Tehachapi Renewable Transmission Project, the CPUC reiterated this determination:

*“the CPUC has preemptive authority over local jurisdictions with regard to the regulation of electrical power lines and electric facilities constructed by public utilities. (See CPUC General Order 131-D.) Therefore, the Project and other projects subject to the CPUC’s jurisdiction are not required to obtain approvals from local agencies, including variances from local noise ordinances.”*<sup>30</sup>

This well-established authority is grounded in the California Constitution, the Public Utilities Code, and General Order 131-D.<sup>31</sup>

Further, CEQA does not require a local agency noise variance to address Impact N-1 for at least three reasons. First, CEQA requires mitigation measures to reduce significant environmental impacts, but a noise variance does not reduce or eliminate a significant environmental impact. Instead, a variance allows legal non-compliance of otherwise applicable noise standards in certain circumstances. Although the Proposed Project will likely result in construction activities that exceed some local noise standards, this is typical for major infrastructure projects, including, but not limited to, transmission line projects. In many cases, after-hours or extended construction *reduces* disturbances by minimizing the impact on local traffic and the public. Limiting construction

F1-21  
cont.

<sup>28</sup> DEIR, p. D.13-17 (emphasis added).

<sup>29</sup> DEIR, p. D.13-18 (emphasis added).

<sup>30</sup> TRTP Findings of Fact, p. 290 (emphasis added).

<sup>31</sup> The California Constitution, Article XII, Section 8, states, a “city, county, or other public body may not regulate matters over which the Legislature grants regulatory power to the [Public Utilities] Commission....” Public Utilities Code Section 701 states, “[t]he Commission may supervise and regulate every public utility in the State and may do all things, whether specifically designated in this part or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction.” Further, General Order 131-D “clarifies that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction.” General Order 131-D, Section XIV(B).

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activities to regular hours could ultimately increase environmental impacts overall by increasing disruptions and delaying other aspects of the project.

Second, if SCE is unable to obtain a local noise variance within a reasonable period of time despite SCE's best efforts, then the mitigation is considered "infeasible" for purposes of CEQA, as defined above. CEQA disallows the imposition of infeasible mitigation. Recent history demonstrates that, in some circumstances, it has been not been feasible to obtain local noise variances within a reasonable period of time, even after using best efforts.

Third, the purpose of any such variance request is to ensure appropriate standards are put in place to minimize noise disturbances to sensitive receptors while allowing construction activities to proceed based on the project schedule. To the extent that a noise variance request is included in the EIR/EIS, this purpose can be satisfied by either receiving an approval from the affected local agency or, if the local agency declines to act on a request in a reasonable period of time, then by the CPUC staff. In either instance, SCE would not proceed with the applicable construction activities until authorized.

For these reasons, SCE prefers having the variance language stricken from the EIR/EIS. If the language is not removed, SCE proposes revised language in the body of its comments to address this issue, which, at a minimum, should be incorporated into the EIR/EIS.

**VII. THE VISUAL RESOURCES ANALYSIS IS FLAWED AND NOT CONSISTENT WITH CEQA**

The DEIR/DEIS analysis of Visual Resources identifies significant impacts during construction and imposes mitigation measures that are fundamentally flawed and not consistent with CEQA.

**A. For Construction Activities, Sweeping Mitigation Would Require Staff to Re-Analyze The Project Post-Approval, Resulting In An Unknown Number Of Design Changes Even Though Information Is Available Now To Include The Analysis In The EIR/EIS**

For construction activities (Impact VR-4), the DEIR/DEIS concludes that, within Segments 2, 3, 4 and 6, construction of the Proposed Project on hilltops and hillsides may create views of newly graded terrain, which constitutes a potentially significant impact. To mitigate this impact, Mitigation Measure VR-4a requires SCE to submit a "map book and description of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6" (emphasis added), which will be analyzed by the CPUC's Visual Specialist "to assess in-line visibility of these Proposed Project features" from undefined "sensitive viewing locations." Based on this post-approval analysis, SCE may be required to redesign the project to address findings and recommendations from the CPUC and BLM visual specialists.

In essence, Mitigation Measures VR-4a creates a process whereby, *after* the EIR/EIS is approved, staff will *re-analyze* every spur road, retaining wall, and ground disturbance area within Segments 2, 3, 4 and 6 resulting in an unknown number of project design changes even though the information is already available and could be included in the EIR/EIS. These design changes may raise new environmental or engineering constraints, which could lead to further delays and

F1-21  
cont.

F1-22

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uncertainty. These concerns are even further magnified when the process created by Mitigation Measure VR-4 is applied to the Phased Build Alternative, as there has only been minimal engineering conducted on the Phased Build Alternative to-date, in contrast to the extensive, detailed engineering that SCE has already completed for the Proposed Project. This mitigation strategy is fundamentally flawed and not allowed under CEQA.

First, CEQA requires an EIR to evaluate and conclude whether specific activities are significant, not simply reach generalized findings. An EIR cannot merely label an impact significant without first providing a detailed discussion and analysis supporting the specific impact conclusion.

Between the PEA and SCE's responses to data requests, there is ample information about the Proposed Project's ground disturbance, retaining walls and spur roads to determine which specific construction activities and locations may cause significant impacts to visual resources. In other words, the EIR/EIS must identify *which specific* spur roads, retaining walls or grading areas will result in a potentially significant impact and not simply conclude that such activities could generically cause potentially significant impacts across the entirety of Segments 2, 3, 4 and 6.

Evidence indicates that there are few, if any, areas within Segments 2, 3, 4 and 6 where construction ground disturbance, retaining walls and spur roads will result in a potentially significant visual impacts requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established right-of-way with existing transmission line infrastructure, substantially reducing the potential for significant visual impacts.

Second, Mitigation Measure VR-4a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some locations with potentially significant impacts within Segments 2, 3, 4 and 6 does not justify a post-approval analysis for the entirety of Segments 2, 3, 4 and 6. CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. In cases where mitigation measures include future analysis, the mitigation measure must identify specific performance standards by which the analysis will be applied. CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis.

While some impact determinations require post-approval analysis, that is *not* the case here. SCE has already submitted the large majority of information contemplated by Mitigation Measure VR-4a. This means the analysis can be completed in the EIR/EIS, which is what CEQA and NEPA intend. To the extent that some additional analysis is required, it should be limited to specific locations where: (1) the EIR identifies a potentially significant impact, not the entirety of the Segment 2, 3, 4 and 6; and (2) the final design is materially different from the design that SCE has already provided.

Third, to the extent that SCE must incorporate additional design features to mitigate potentially significant impacts from ground disturbance, retaining walls or spur roads, the options should be clearly identified in Mitigation Measure VR-4a. Additionally, these options should explain the potential schedule and cost impacts to allow the Commission and the public to have a full understanding of the proposed mitigation. Accordingly, Mitigation Measure VR-4a should identify the design measures that SCE can apply prior to final design to ensure visual impacts are

F1-22  
cont.

F1-23



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reduced to less than significant levels. Post-approval evaluation by the CPUC's Visual Specialist can then be limited to determining whether SCE has applied the appropriate measures.

F1-23  
cont.

SCE has respectfully proposed removal of Mitigation Measure VR-4a to address this comment.

**B. For Operational Impacts, the DEIR/DEIS Applies Onerous Mitigation Across the Entire Project Even Though Only A Select Few Locations Result in Significant Visual Impacts**

F1-24

For operational visual impacts, the DEIR/DEIS identifies four discrete locations where there will be significant visual impacts. For the large majority of the project's 48 corridor miles, impacts as a result of SCE's Proposed Project will be either beneficial or less than significant. Nevertheless, the DEIR/DEIS imposes onerous mitigation measures across the entirety of the project.

Under CEQA, mitigation can only be required to reduce significant impacts, and where mitigation is applied, it must be limited in scope by having an "essential nexus" to the nature of the impact and be "roughly proportional" to the scale of the impacts of the project.

In contrast to the clear limits imposed by CEQA, the DEIR/DEIS applies Mitigation Measures VR-8a and VR-9a across the entirety of the project, not just the locations where a significant visual impact would occur. The DEIR recommends that Measures VR-8a and VR-9a apply to sections with a less than significant impact to "further reduce the adverse visual effects," and to sections with beneficial impacts to "further ensure that the resulting impacts are an improvement and are, in fact, beneficial."

Simply put, this approach is not consistent with CEQA. Mitigation measures should only be applied to reduce significant environmental impacts, not to "further reduce" less than significant impacts or to ensure that beneficial impacts occur. As proposed, Mitigation Measures VR-8a and VR-9a would impose substantial costs and effort on SCE that are not connected to or roughly proportional to the limited nature of the impact.

As discussed in the PEA, SCE will reduce visual impacts across the entirety of the project by applying design features intended to reduce visual effects, including revegetation, recontouring, use of appropriate materials, light shielding, and glare reduction as appropriate. However, except for the limited locations identified in the DEIR/DEIS where significant visual impacts will occur, no additional mitigation is permitted under CEQA. As such, SCE respectfully proposes removal of Mitigation Measures VR-8a and VR-9a.

**VIII. SOLAR PROJECTS ARE NOT "CONNECTED ACTIONS" UNDER NEPA AND ARE MORE APPROPRIATELY ANALYZED AS CUMULATIVE IMPACTS**

F1-25

The DEIR/DEIS identifies seven solar generation projects ("Solar Generation Projects") as "connected actions." Under NEPA, actions are connected if they: "(i) automatically trigger other actions which may require environmental impact statements; (ii) cannot or will not proceed unless other actions are taken previously or simultaneously; (iii) are interdependent parts of a larger action and depend on the larger action for their justification." 40 C.F.R. § 1508.25(a)(1).

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It is well settled law that the Ninth Circuit applies “an ‘independent utility’ test to determine whether multiple actions are so connected as to mandate consideration in a single EIS.” *Cal. ex rel. Imperial Cnty. Air Pollution Control Dist. v. U.S. Dept. of the Interior*, 767 F. 3d 781, 795 (9th Cir. 2014) (quoting *Great Basin Mine Watch v. Hankins*, 456 F. 3d 955, 969 (9th Cir. 2006) (quoting *Wetland Actions Network v. U.S. Army Corps of Eng’rs*, 222 F. 3d 1105, 1118 (9th Cir. 2000)).

Independent utility is established “when one of the projects might reasonably have been completed without the existence of the other, the two projects have independent utility and are not ‘connected’ for NEPA’s purposes.” *Sierra Club v. Bureau of Land Mgmt.*, No. 13-15383, 2015 U.S. App. LEXIS 8728 (9th Cir. May 27, 2015) (citing *Pac. Coast Fed. of Fishermen’s Ass’ns v. Blank*, 693 F.3d 1084, 1098 (9th Cir. 2012) (citing *Great Basin Mine Watch v. Hankins*, 456 F. 3d 955, 969 (9th Cir. 2000)).

Multiple actions can have independent utility even if they have “overlapping, but not co-extensive, goals.” *Pac. Coast Fed. of Fishermen’s Ass’ns*, 693 F.3d at 1098-1099 (“While it is true the record is replete with statements about how Amendments 20 and 21 are linked, two actions are not connected simply because they benefit each other or the environment.”) This point was squarely addressed by the Ninth Circuit in *Sylvester v. U.S. Army Corps of Eng’rs*, 884 F. 2d 394 (9th Cir. 1989), where a developer proposed a resort in Squaw Valley, California, which included skiing facilities, a resort village, and a golf course. The golf course was to be located on a meadow, while the resort and ski runs were to be situated on neighboring uplands. The meadows contained pockets of wetlands, which triggered NEPA review of the proposed plan by the Army Corps of Engineers. In its evaluation of the Proposed Project, the Army Corps considered only the impacts of the golf course, and not the impacts of the rest of the resort complex, because it viewed its jurisdiction to extend only to the meadows containing the wetlands. A third party challenged the Army Corps’ decision, asserting that the Army Corps improperly limited the scope of its NEPA analysis to the golf course rather than reviewing the environmental impact of the entire proposed resort. The district court granted the third-party’s request for a preliminary injunction enjoining the construction of the proposed golf course.

The Ninth Circuit reversed. While acknowledging that federal agencies cannot divide projects to avoid meaningful NEPA review, the Ninth Circuit held that the Army Corps’ decision to limit its review to only the wetlands was proper because “each could exist without the other, although each would benefit from the other’s presence.” *Id.*, at 400.

Applied here, West of Devers and the Solar Generation Projects are not connected actions because “one of the projects might reasonably have been completed without the existence of the other,” meaning “the two projects have independent utility and are not ‘connected’ for NEPA’s purposes.” See *Sierra Club v. Bureau of Land Mgmt.*, No. 13-15383, 2015 U.S. App. LEXIS 8728 (9th Cir. May 27, 2015).

Even though SCE proposed the WOD Upgrade Project in part to satisfy the full deliverability requests of certain generators, including the Solar Generation Projects, SCE identified independent purposes for the project. Specifically, other independent purposes of West of Devers include:

- Support California’s greenhouse gas reduction program;

F1-25  
cont.



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- Support federal renewable energy goals;
- Support goals of the California Energy CPUC Integrated Energy Policy Report; and
- Support the Desert Renewable Energy Conservation Plan.

F1-25  
cont.

By supporting these other objectives, the WOD Upgrade Project has utility that is independent of the objective to interconnect the Solar Generation Projects. As such, the WOD Upgrade Project has independent utility from the Solar Generation Projects. Similarly, the Solar Generation Projects have independent utility separate from the WOD Upgrade Project, such as facilitating the goals of the DRECP and meeting state and federal renewable energy goals.

In contrast, the DEIR/DEIS does not properly apply the independent utility test. The DEIR/DEIS concludes the Solar Generation Projects are connected actions because the WOD Upgrade Project is needed to ensure the full deliverability of these projects. SCE does not dispute this fact. However, even though the Solar Generation Projects need the WOD Upgrade Project for full deliverability, the projects are not connected actions under NEPA because the WOD Upgrade Project has independent utility. As the Ninth Circuit held in *Sylvester*, two projects can have independent utility even if each project benefits the other.

A conclusion of independent utility is supported by the fact that the WOD Upgrade Project and the Solar Generation Projects will each undergo separate and complete environmental review. The Ninth Circuit has emphasized that the purpose behind the connected actions requirement is to ensure that environmental review is not avoided by segmentation. See *Pac. Coast Fed. of Fishermen's Ass'ns*, 693 F.3d at 1099 ("Perhaps more important than parsing NMFS's words or predicting whether it would adopt one Amendment without the other is answering the question whether, in preparing separate EISs, NMFS evaded its duty to fully study the combined effects of Amendments 20 and 21. This is the real concern behind [40 C.F.R.] § 1508.25.")

With the Solar Generation Projects, as in *Pac. Coast Fed.*, "This 'divide and conquer' concern is not present here." *Id.* The Solar Generation Projects will each undergo full environmental review under CEQA and/or NEPA, as appropriate. In addition, the Solar Generation Projects will be analyzed as cumulative impacts even if not considered connected actions, ensuring that environmental effects are not being ignored. See, 179 Interior Board of Land Appeals (IBLA) 148, 173 (2010) ("[Plaintiff] offers no argument or evidence that any cumulative impact is likely to be ignored or overlooked were the [transmission] line and any of the identified wind farm projects to be considered separately.")

Instead of being connected actions, the Solar Generation Projects are more properly analyzed as cumulative impacts. CEQA requires an EIR to evaluate cumulative impacts of a project, which are defined as two or more individual effects which, when considered together, are considerable or compound or increase other environmental impacts. CEQA Guidelines § 15355. "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects." CEQA Guidelines § 15355(b).

NEPA also requires consideration of cumulative effects, defined as "the impact on the

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environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” 40 C.F.R. § 1508.7. While courts have held that “reasonably foreseeable” actions do not include “highly speculative” harms, they do include impacts “sufficiently likely to occur that a person of ordinary prudence would take it into account in reaching a decision.” *City of Shoreacres v. Waterworth*, 420 F.3d 440, 453 (5th Cir. 2005).

Here, because the Solar Generation Projects are reasonable foreseeable future projects related to West of Devers, but not connected actions, they should be considered in the cumulative impacts analysis of the DEIR/DEIS.

**IX. CONCLUSION**

SCE has identified multiple issues associated with the Phased Build Alternative and certain of the mitigation measures proposed in the DEIR/DEIS. From the information presented in this letter and the associated attachments, the Phased Build Alternative is not the Environmentally Superior Alternative and must be discarded in the FEIR/FEIS as a project alternative, or, at a minimum, the FEIR/FEIS should identify its serious feasibility constraints and increased environmental impacts compared to the Proposed Project. The Phased Build Alternative’s failure to meet most of the basic project objectives, its greater environmental impacts, and the feasibility issues identified herein demonstrate that it is not an environmentally superior alternative to the Proposed Project and therefore should be rejected.

Very truly yours,

Rebecca A. Furman  
Attorney for Southern California Edison

Laura B. Renger  
Attorney for Southern California Edison

F1-25  
cont.

F1-26

## Responses to Comment Set F1 – Southern California Edison (Cover Letter)

- F1-1 These introductory comments from SCE claim that the Phased Build Alternative is “an entirely new alternative based on an untested and flawed analysis” of system needs and that the analysis cannot be relied upon for transmission planning purposes. Each of these comments is addressed in General Responses GR-1 (Project Need) and GR-2 (Agency-defined Basic Project Objectives), as well as individual responses below (including F1-5 to F1-9). These responses address the general requirements of NEPA to describe a reasonable range of alternatives, which, in this case, includes the Phased Build Alternative.

Additional individual responses (including Responses to Comments F1-10 through F1-15) address the conclusion made in the Draft EIR/EIS that the Phased Build Alternative is “potentially feasible” and eligible for consideration within an EIS. These responses also demonstrate that the alternative is considered to be feasible and likely to have environmental advantages that allow it to be designated as environmentally superior to the Proposed Project. See also General Response GR-3 on how renewable energy projects would be accommodated.

- F1-2 The commenter notes that CPUC’s authority over transmission construction preempts local ordinances. SCE clarifies that it did not propose to request variances for work outside of certain hours, alleging that in some unspecified instances local agencies have declined to grant variance requests in a reasonable period of time.

Section D.13.3.3 (Noise, Impacts and Mitigation Measures), under the heading Construction Noise Compliance with Local Ordinances, the EIS text has been modified to clarify the intent of the discussion. SCE, in its PEA, commits to coordination with local agencies to minimize conflicts with applicable ordinances. SCE’s commitment in its PEA and the noise mitigation measure documented in the EIS recognize the importance of consulting with, and fully informing, local jurisdictions before undertaking sensitive activities such as night construction work. The text of the EIS no longer references the need for a variance, but it references the important coordination to which SCE has committed. In the Draft EIR/EIS, Mitigation Measure N-1a (Implement best management practices for construction noise) did not require a variance to be obtained; it simply required compliance with the schedule developed in SCE’s coordination with local jurisdictions. The mitigation language has been modified to clarify this process. The noise mitigation measure, ensures that SCE’s commitment will be followed and that compliance with the results of SCE’s coordination will be monitored.

- F1-3 The commenter asserts that mitigation for less-than-significant construction impacts presented in Section D.18.3.3 (Impacts and Mitigation Measures) is not consistent with CEQA because mitigation can only be required for significant impacts.

The Draft EIR/EIS was a joint CEQA/NEPA document. The Final EIS is a NEPA document; NEPA requires the application of feasible mitigation even if an impact is less than significant.

The commenter also asserts that the mitigation measures for construction impacts require an onerous post-EIR applicability determination that is unnecessary because sufficient information is available now for such a determination.

The Draft EIR/EIS was prepared based on SCE’s preliminary engineering and project design plans. The preliminary nature of the project design is highlighted in SCE’s comment on Draft

EIR/EIS (Comment F3-67, page B-27 of SCE's Attachment B). In this comment, SCE does not controvert the Draft EIR/EIS text that states retaining walls may be required along some access roads and that retaining wall locations are preliminary. As pointed out in the Draft EIR/EIS text cited by SCE, the specific number of retaining wall structures and locations would be identified during final engineering and could range between 2 and 18 feet in exposed height. Furthermore, in all but two cases (views from San Geronio Memorial Park and Cemetery and views from the Pacific Crest Trail near the Whitewater residential community), the structure installation/removal impact areas would typically be visible from numerous residences and/or multiple or major roadways. Consequently, the Final EIS imposes Mitigation Measures VR-2a (Minimize vegetation removal and ground disturbance, and limit ground disturbance in Segments 2, 3, and 6), VR-3a (Reduce color contrast of retaining walls, land scars, and graveled surfaces), and VR-4a (Minimize in-line views of retaining walls and land scars) to address these visual impacts.

SCE did disclose in its comment, however, that additional engineering analysis, conducted since preparation of the Draft EIR/EIS, has reduced the linear feet estimates for retaining walls down from approximately 4,010 linear feet to approximately 3,168 linear feet with revisions occurring in Segments 2 through 6. Based on the additional engineering that SCE has provided, the EIS team has narrowed the locations where Mitigation Measures VR-2a, VR-3a, and VR-4a would apply. However, even with this additional analysis, it is still clear that there will still be some visual impacts at specific locations where Mitigation Measures VR-2a, VR-3a, and VR-4a would be applied. A field assessment was conducted in response to this comment and the results are presented in a new table in Section D.18.3.3: Table D.18-11 (Structure locations subject to Mitigation Measures VR-2a, VR-3a, and VR-4a). The table provides a list of structure locations (proposed, to be modified, and to be removed) that have been identified as subject to these three mitigation measures, based on the high visibility of their respective installation/removal impact areas to residences, roads, recreation facilities, and other public locations. Although the number of structure locations presented in Table D.18-10 has been considerably reduced from the total number of structure locations covered by the blanket application of MMs VR-2a, VR-3a, and VR-4a in the EIR, at least one structure location was identified in each of the six segments. Therefore, the descriptions of Mitigation Measures VR-2a, VR-3a, and VR-4a have been revised in the EIS to include application to all segments. As noted in the new text introduction to Table D.18-11, if structure installation, modification, or removal activities result in benign visual outcomes (lack of visual contrast), the mitigation prescribed in MMs VR-2a, VR-3a, and VR-4a would not be necessary.

F1-4

The commenter suggests that the solar generation projects that will utilize the Project to deliver renewable energy to the grid should have been evaluated as "cumulative projects" in the Draft EIR/EIS, rather than as "connected actions." Under CEQA, these projects are considered part of the "whole of the action" because the "connected" projects are enabled by the completion of the Proposed Project.

NEPA defines "connected actions" as actions that: "(i) automatically trigger other actions which may require environmental impact statements. (ii) cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) are interdependent parts of a larger action and depend on the larger action for their justification." 40 C.F.R. § 1508.25 (a)(1).

The independent utility test applied by the Ninth Circuit Court of Appeals to determine whether a proposed project and another action are connected actions examines whether the other action would occur in the absence of the proposed project. In other words, “[w]here each of two projects would have taken place with or without the other, each has ‘independent utility’ and the two are not considered connected actions [under NEPA].” *Native Ecosystems Council v. Dombeck* (9th Cir. 2002) 304 F.3d 886, 894 (emphasis added); see also, *Sierra Club v. Bureau of Land Management* (9th Cir. 2015) 786 F.3d 1219, 1226 (“Rather than adopting a single independent utility test, we have focused on whether each of two projects would have taken place with or without the other, and have extended our analysis to each project”); *Great Basin Mine Watch v. Honkins* (9th Cir. 2006) 456 F.3d 955, 969 (explaining that the crux of the independent utility test is whether each of two projects would have taken place with or without the other); *California ex rel. Imperial County Air Pollution Control Dist. v. U.S. Dept. of the Interior* (9th Cir. 2014) 767 F.3d 781, 795 (accord).

Project purpose and need is not a factor of independent utility. Whether a proposed project and another project have similar or divergent goals and objectives is wholly irrelevant to the connected action analysis. The test is whether an action other than the proposed Project will or will not be physically completed in the absence of the proposed Project and vice-versa.

Section B.7 (Description of the Project, Connected Actions), details seven renewable solar projects that “...depend on the WOD Upgrade Project in order to move to construction and operation...” See Section B.7.1. These renewable solar projects are described in detail in Section B.7.2 and Table B-22 explains why each is considered a connected action to the WOD Upgrade Project. As explained in Table B-22, these solar renewable projects will not be constructed unless the WOD Upgrade is built because each of the renewable projects needs to utilize the upgraded transmission lines of the WOD Upgrade Project to get the energy generated by these projects to market. In fact, executed interconnection agreements for two of the seven projects expressly presume implementation of the WOD Upgrade Project. Thus, as the EIS documents, the seven renewable solar projects will not go forward unless the WOD Upgrade Project is constructed and, therefore they were properly evaluated as connected actions to the WOD Upgrade Project in accordance with NEPA. *Sierra Club v. Bureau of Land Management* (9th Cir. 2015) 786 F.3d 1219, 1226.

F1-5

The comment reviews the objectives set forth by SCE in the PEA and asserts that the CPUC and BLM Basic Project Objectives unnecessarily eliminated and narrowed some of SCE’s objectives. The rationale for selecting each of the CPUC and BLM Basic Project Objectives is presented in EIS Section A.2.3. General Response GR-2 also provides a discussion of the agency-specific Basic Project Objectives. Basic Project Objective 1 retains SCE’s objective to integrate and fully deliver new generation projects located in the Blythe and Desert Center areas with a modification to specify a minimum level of deliverability to be achieved, at the 2,200 MW level.

The commenter believes that the Draft EIR/EIS improperly narrows and/or eliminates certain of the WOD Upgrade Project applicant’s proposed objectives. The commenter also believes that the Phased Build Alternative does not achieve certain of the WOD Upgrade Project applicant’s proposed objectives.

Project Purpose and Need are presented in Section A.2.1 (Introduction, Purposes of the Proposed Project) and SCE’s Project Objectives are presented in Section A.2.1.2. As a preliminary

nary matter, it should be noted that the WOD Upgrade Project applicant's proposed objectives #3 (Meet project need while minimizing environmental impacts) and #5 (Comply with applicable Reliability Standards and Regional Business Practice developed by NERC, WECC, and the CAISO) are not appropriate objectives for purposes of the required alternatives analysis. This are requirements; the need to comply with laws, regulations, and conditions of project approval are a given. This precept obligates every project sponsor to construct and operate a proposed project in a manner that minimizes environmental impacts whether minimization of impacts is specifically identified as a project objective or not. Similarly, compliance with applicable transmission reliability and construction standards is presumed, and, therefore also is not an appropriate objective for use in an alternatives analysis.

The commenter states that the Draft EIR/EIS inappropriately narrowed or eliminated objectives. The fundamental legal guidance on Purpose and Need Statements comes from the NEPA CEQ regulation, Section 1502.13—the Purpose and Need Statement “shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” BLM’s NEPA Handbook states that the “purpose and need statement for an externally generated action must describe the BLM purpose and need, not an applicant’s or external proponent’s purpose and need. The applicant’s purpose and need may provide useful background information, but this description must not be confused with the BLM purpose and need for action.” (BLM NEPA Handbook H-1790-1 pg 35)

EIS Section ES.1.2 (Executive Summary, Proposed Project Purpose and Need) discloses objectives proposed by the WOD Upgrade Project applicant as well as the basic objectives reasonably derived therefrom by the CPUC and BLM from those applicant-proposed objectives in accordance with CEQA.

The commenter also suggests that the Phased Build Alternative does not meet certain objectives. While SCE may put forward its corporate objectives for the project, BLM is required to address the objectives that it identifies, and not simply use those of the applicant. BLM enjoys substantial flexibility in construction its purpose and need statement.

F1-6

The comment asserts that the power flow analysis of the Phased Build Alternative is flawed, by underestimating system needs and by making errors in the alleged capabilities of the alternative. Please see also the Responses to Comment Set F2, addressing comments in SCE’s Attachment A, which address the accuracy of the ZGlobal power flow studies in more detail.

SCE states that various transmission elements such as a remedial action scheme (RAS) and reactive support, of up to 600 MVAR of capacitors, may be needed with the Phased Build Alternative. The implementation of a RAS and additional reactive support features would only be added to the corridor in response to excessive levels of generation, should it be developed. The need for reactive support with capacitor banks at multiple locations is identified for the Phased Build Alternative as necessary in the results of power flow modeling Case #6. This case includes dispatch of generation at a level of deliverability (the Cluster 7, Phase I case) that would be greater than anticipated, plus the import of 1,400 MW from IID. The conclusion for Case #6 shows that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p. 12). Furthermore, adding a RAS would not be a substantial change in operational complexity from the conditions that presently exist in the corridor, which presently operates with a RAS; this is described as part



of the No Project / No Action Alternative in EIS, Section C.6.2.1. In contrast with the “system needs” portrayed in the comment, the Phased Build Alternative satisfies the lower level of dispatch in the Reliability Base Case in modeling Case #3 without the need for additional reactive support (EIS Appendix 5, Attachment 2, p. 10).

The comment notes the level of dispatch modeled with the Reliability Base Case in Case #3 of the power flow analysis. The modeling of the 2024 Reliability Base Case has 1,387 MW online at Red Bluff and Colorado River Substations (details in Table A4 of EIS Appendix 5, Attachment 2, p. 21). This level of online power generated is a representation of 3,853 MW of installed renewable resource capacity at these interconnection points accounting for the 36 percent capacity factor of the case. Although the SCE comment disagrees with the level of generation modeled, the comment does not contradict the EIS conclusion that the Phased Build Alternative satisfies the level of generation modeled with the Reliability Base Case in modeling Case #3 (EIS Appendix 5, Attachment 2, p. 10). The power flow analysis of Case #3 also includes the import of 1,400 MW from IID.

The comment notes that the 2013 West of Devers Interim Project presently provides deliverability to 985 MW of installed renewable generation from projects that have Full Capacity Deliverability Status (FCDS) in the baseline conditions. General Response GR-2 notes that the power flow analysis in the EIS does not include a formal study of deliverability. However, in the context of the EIS power flow analysis, as baseline generators, these are included in the various scenarios, including at the level of dispatch modeled with the Reliability Base Case in Case #3. EIS, Section B, Description of the Proposed Project, and the EIS power flow analysis recognize that the 2013 West of Devers Interim Project (EIS Section B.1.1) would be removed as part of the Proposed Project, and accordingly, it is not part of the modeling of the alternative. This topic is also addressed in Response to Comment B9-5 (CAISO comment).

F1-7

The comment claims that the Phased Build Alternative would not meet most of SCE’s Project Objectives. The rationale for selecting each of the CPUC and BLM Basic Project Objectives is presented in EIS Section A.2.3, and General Response GR-2 provides a discussion of the agency-specific Basic Project Objectives. These topics are also addressed within Response to Comment F1-5. See also General Response GR-1 on the level of project need, and General Response GR-3 on renewable energy that would be accommodated by the Phased Build Alternative.

The comment notes that the Phased Build Alternative satisfies “only one” of the EIS power flow analysis cases. Although this is true, the comment does not contradict the EIS conclusion that the Phased Build Alternative satisfies the level of generation modeled with the Reliability Base Case in modeling Case #3 (EIS Appendix 5, Attachment 2, p. 10). Of the seven cases in the power flow analysis, five cases tested the Proposed Project, and two cases (Case #3 and #6) tested the Phased Build Alternative. While the Phased Build Alternative is shown to be not technically feasible in the results of power flow modeling Case #6 (EIS Appendix 5, Attachment 2, p. 12), this higher level of generation is the same as in Case #5. Case #5 and #7 show that the Proposed Project results in overloading the Alberhill-to-Valley 500 kV line under normal operating conditions (EIS Appendix 5, Attachment 2, p.11).

F1-8

The comment claims that the Phased Build Alternative would not meet two of the three Basic Project Objectives, with a focus on Basic Project Objective 1 in this comment. See

General Response GR-1 on the level of project need and General Response GR-2 on the ability of the Phased Build Alternative to satisfy Basic Project Objective 1.

The comment also asserts that the power flow analysis is fatally flawed by underestimating system needs, and the power flow analysis should not be relied upon for transmission planning purposes. The power flow analysis in the EIS does not include a formal study of deliverability. Instead, given NEPA requirements for alternatives, the EIS focuses on determining whether the alternatives are feasible. General Response GR-3 includes information on the transmission planning process as it relates to the project-level environmental review.

The comment discusses renewable projects amounting to 1,929 MW of generation resources having executed generator interconnection agreements and incorrectly asserts that the EIS excludes this generation in the consideration of the Phased Build Alternative. All of the individual projects listed in this comment appear in the EIS, Section A.2.1.4, Interconnecting Planned Generation Resources (Table A-4, Projects Contributing to Need for WOD Upgrade Project). All of the individual projects that make up this 1,929 MW and the environmental impacts related to these projects are specifically identified and included as either “connected actions” (EIS Section B.7.1, Table B-22) or Cumulative Projects (EIS Section E.2, Table E-1).

The comment correctly notes that the 2024 Reliability Base Case and power flow analysis Case #3 includes generation producing 1,387 MW at Red Bluff and Colorado River Substations. The comment goes on to incorrectly claim that “only 337 MW of additional new resources” could be developed at the Red Bluff and Colorado River Substations. The comment does not acknowledge how the modeling case with 1,387 MW online is a representation of 3,853 MW of installed renewable resource capacity at these interconnection points. This is because, as previously noted by SCE in Comment F1-6, the Reliability Base Case sets the output of these renewable resources to 36 percent of their maximum capability. Therefore, the Reliability Base Case reflects 3,853 MW installed capacity at these interconnection points (details in Table A4 of EIS Appendix 5, Attachment 2, p. 21), which is more than 2,800 MW in addition to the 1,050 MW installed capacity that is in-service as noted by SCE in this comment. Notably, the 3,853 MW of installed capacity in Case #3 is also a level sufficient to accommodate the 3,800 MW Riverside East renewable resource portfolio in the transmission planning process, as transmitted in the March 11, 2015 letter from the CPUC to CAISO. Nothing in SCE’s comment contradicts the EIS conclusion that the Phased Build Alternative satisfies the level of generation modeled with the Reliability Base Case in Case #3 (EIS Appendix 5, Attachment 2, p. 10).

The comment points to the EIS power flow study to indicate that the flow through the WOD corridor would be limited to 1,900 MW instead of the value of roughly 3,000 MW that is derived in the Draft EIR/EIS (see Table Ap5.1-4, p. Ap.5 Att.1-2). This comment is based on SCE’s review of Case #6 in the power flow analysis. The conclusion for Case #6 shows that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p. 12). The EIS clearly discloses that the Phased Build Alternative would have lower power flows and a lower corridor transfer capability than the Proposed Project (Appendix 5, Attachment 1 and Attachment 2).

The comment indicates that additional information would be needed to determine the actual level of generation deliverability, in MW, provided by the Phased Build Alternative. The comment notes this would require a deliverability study prepared in a manner consist-



tent with the CAISO's deliverability study methodology. Note that Comment B9-8 indicates CAISO's intent to conduct a comparative analysis of project alternatives using the CAISO's deliverability study methodology, and CAISO intends to present its results in testimony in the CPUC general proceeding (A.13-10-020).

See also Responses to Comments B9-2, B9-3, B9-8, and B9-9 (CAISO comment).

- F1-9 The comment claims that the Phased Build Alternative would not meet two of the three Basic Project Objectives, with this comment focusing on Basic Project Objective 2. See Response to Comment F1-8 regarding the modeled power flows and the lower levels of corridor transfer capabilities that are expected with the Phased Build Alternative in comparison with the Proposed Project.

SCE states that the Phased Build Alternative would create an impediment in achieving California's renewable energy goals, including a higher 50 % RPS in Senate Bill 350 (2015). This comment does not contradict the EIS conclusion that the Phased Build Alternative satisfies the level of generation modeled with the Reliability Base Case in Case #3 (EIS Appendix 5, Attachment 2, p. 10). The level of generation in this case is sufficient to accommodate the 3,800 MW Riverside East renewable resource portfolio in the transmission planning process, and the power flow analysis of Case #3 also includes the import of 1,400 MW from IID. The Reliability Base Case reflects 3,853 MW installed capacity at the Riverside East interconnection points (details in Table A4 of EIS Appendix 5, Attachment 2, p. 21), which is sufficient to accommodate the 3,800 MW Riverside East renewable resource portfolio for the 33% RPS in the transmission planning process, as transmitted in the March 11, 2015 letter from the CPUC to CAISO.

General Response GR-3 provides further information on the ability of the Phased Build Alternative to satisfy Basic Project Objective 2.

See also Response to Comment B9-3.

- F1-10 This comment focuses on SCE's opinion that the Phased Build Alternative is infeasible due to construction requirements and design characteristics that could not be accommodated in what SCE feels is a reasonable period of time and could create impacts in areas not previously analyzed. The comment states that the Phased Build Alternative could require an expansion of planned wire stringing sites and additional stringing sites.

SCE states, "In order to install the Phased Build Alternative's 795 Aluminum Conductor Composite Reinforced (ACCR) conductor, planned wire sites would need to be modified and new wire sites would be required." SCE's observation is based upon manufacturer information regarding specific maximum allowable bending angles that cannot be exceeded when pulling ACCR conductor. The EIS recognizes that SCE would need to consider the specifications of the conductor material; however, this would not introduce any infeasibility as utility companies commonly handle different conductor types and sizes that have specific requirements or limitations on how the conductors are handled during pulling and installation.

The fact that SCE would need to revise its conductor stringing plan to address the specific requirements of ACCR conductor does not make use of ACCR technically infeasible. Specifically, SCE observes, "the practical effect of this difference is that SCE's Proposed Project allows constructing wire sites at a much greater angle from the path of the transmission line being constructed." Acknowledging that the use of ACCR conductor may preclude SCE from

utilizing some planned stringing sites that would place a large angle on the conductor, it is anticipated that this is not the case for the majority of the stringing sites, assuming that most sites would not place a large angle on the conductor.

Furthermore SCE states, "There are very few locations where SCE could site additional pulling and tensioning locations to support the installation requirements of the 795 ACCR conductor without conducting extensive grading or locating wire sites outside the existing ROW." This statement appears to indicate that where the Proposed Project's stringing plan includes too large an angle for stringing ACCR, the use of ACCR would either require additional land disturbance, additional stringing locations, or placing the stringing operations outside of the existing ROW. None of these requirements make the use of ACCR conductor technically infeasible. SCE further comments "Even if it is feasible to relocate wire sites within areas suitable to limit wire stringing angle to within the manufacturer's specification, the environmental effects of such relocations need to be acknowledged."

The EIS discloses that the first step of the wire stringing activities is to develop a wire stringing plan that identifies, among other things, the set-up locations for the wire pulling equipment and activity (Section B.3.3.10). The EIS considers that wire sites can result in an environmental impact due to ground disturbance and other activity within the sites. However, in terms of ground disturbance and potential environmental effects the Phased Build Alternative is expected to have less overall environmental impact by reducing the number of existing towers to be removed and new towers to be constructed. In contrast with the Proposed Project, this would decrease the overall amount of ground disturbance, even if previously anticipated changes in disturbance for set-up locations may occur for the conductor stringing sites. Based on the disturbed area SCE identified for each lattice steel tower, the disturbed area avoided, by reducing the number of structures removed and new structures built, is anticipated to be more than 400 acres. The comment fails to recognize the reduction in impacts resulting from the re-use of existing double-circuit lattice towers that would occur under the alternative.

With the ground disturbance for stringing setup and splicing setup at 2 acres and 0.7 acres, respectively, it can be seen that even with a need for additional wire stringing sites, the Phased Build Alternative would result in an overall reduction in ground disturbance when compared to the Proposed Project. These stringing sites would not notably increase the overall project disturbance area and associated impacts. Even under scenarios where a quarter to a third more stringing sites would be required, the difference of using ACCR conductor when considering both structure and stringing disturbances would be a net reduction in disturbed area of several hundred acres.

This comment also identifies SCE's concerns on: outages during construction of the Phased Build Alternative; the need for future construction within the corridor after implementing the alternative; and the environmental impacts of the future construction, should it become needed. These topics are addressed in subsequent individual Responses to Comments F1-11 through F1-14.

- F1-11 This comment identifies SCE's concerns that outages during construction of the Phased Build Alternative would exceed those of the Proposed Project. SCE states that the need for double-line outages would increase under the alternative when compared with the Proposed Project. Outages of existing lines would be necessary during construction of the Proposed Project, and in the comment, SCE states, "With minor exceptions, the Proposed

Project design placed the new towers in such a location that the construction could proceed without having to de-energize more than one of the four existing 220 kV circuits for long periods of time.” SCE has also indicated that for the Proposed Project, a number of shoo-flies (temporary poles to hold up energized conductors) will need to be utilized. Pointing to uncertainty on whether CAISO might approve certain outages, SCE has not specified the precise location or timing of the shoo-flies for the Proposed Project.

Because the Phased Build Alternative would require stringing of new conductor on existing towers, the alternative will require more outages than would the Proposed Project. As with the Proposed Project, it is expected that to avoid some of the additional outages, shoo-flies will need to be utilized in order to carry energized conductors while construction is ongoing on the existing structures. After providing comments on the Draft EIR/EIS, SCE evaluated potential construction scenarios. To clarify how the need for outages could be minimized, SCE provided responses to Data Request 17 (Response ALT-29), which provides details on a construction plan for the Proposed Project and the Phased Build Alternative. In Response to Data Request ALT-29, SCE presents an alternative construction plan in which 136 shoo-flies would be required for the Phased Build Alternative, compared with 51 for the Proposed Project. Overall, the construction timeframe would be similar for the Phased Build Alternative and the Proposed Project due to the additional coordination required to manage outages. Outages would also need to occur during construction of the Proposed Project; the need to manage and coordinate similar outages would not make the Phased Build Alternative infeasible.

See also Response to Comment B9-4 regarding the potential for outages and line losses to influence generator dispatch, or generator curtailment and the associated economic loss.

- F1-12 This comment includes SCE’s opinion that the Phased Build Alternative is infeasible due to regulatory constraints in permitting future phases and due to the long lead time required to obtain approvals from the CPUC and BLM for new transmission. This comment identifies SCE’s concerns regarding the need for future construction within the corridor after implementing the alternative, based on SCE’s presumption that future expanded transmission capacity would be needed. This comment and the presumption that future construction would be needed within the corridor are also repeated by SCE in Comment F1-13.

The EIS recognizes the long lead time in developing new transmission by describing the origin of the Proposed Project, as a part of SCE’s 2005 application that proposed Devers-Palo Verde No. 2 project and then as a response to CAISO specifications for a Delivery Network Upgrade in 2010 (Section A.2.1.4.1). Clearly, the EIS contemplates that transmission additions do not occur “just in time” as implied by the comment. Ultimately, the CPUC must find that the project is necessary to promote the safety, health, comfort, and convenience of the public under General Order (GO) 131-D. See General Response GR-1 for a review of CPUC project-level review process, and GR-3 for a review of how the CAISO’s Transmission Planning Process relates to the environmental review for this project-level request for a CPCN.

See also General Response GR-4 on the need for “future phases” of construction under the Phased Build Alternative.

F1-13 The commenter alleges the Draft EIR/EIS violates the CEQA prohibition against piecemeal environmental review by “chopping up” or “segmenting” the WOD Upgrade Project. See General Response GR-4 on the need for “future phases” of construction under the Phased Build Alternative.

This comment relates to CEQA and not NEPA. The CPUC’s response is provided here for informational purposes. As noted by the commenter, CEQA Guidelines Section 15378(a) defines a “project” as “the whole of an action” that may result in either a direct physical environmental change or a reasonably foreseeable indirect change. The commenter also correctly cites the seminal CEQA decision in *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, which adds to the requirement that an EIR describe and analyze the whole of a project by holding that an EIR’s project description and analysis of potential project impacts must also include all relevant parts of a project, including reasonably foreseeable future expansion or other activities that are part of the project. Accordingly, the entire project being proposed for approval and all reasonably foreseeable project expansion must be described and analyzed in the EIR.

Without addressing the EIR’s actual WOD Upgrade Project description located in Chapter B, however, the commenter inappropriately leaps to and applies these project description and project impact analysis principles to the EIR’s determination of the basic project objectives and treatment of the Phased Build Alternative summarized in Chapter A (Introduction) and addressed in detail in Chapter C (Alternatives). Separate and apart from the requirements concerning the proposed project analyzed in an EIR, CEQA has distinct and different requirements for the description and analysis of *alternatives* to the proposed project. As discussed in Response to Comment F1-5, CEQA charges lead agencies with developing and presenting a comparative analysis of a reasonable range of feasible alternatives to the proposed project so that the public and decision-makers can make an informed evaluation of the merits of a proposed project as compared to the developed alternatives (CEQA Guidelines § 15126.6) and expressly affords lead agencies with the discretion to distill overly broad or narrow objectives down to fundamental basic objectives for purposes of conducting the required comparative analysis of the proposed project and its alternatives. In accordance with CEQA, EIR Sections C (Alternatives) and G (Comparison of Alternatives) and Appendix 5 (Alternatives Screening Report) adequately describe and evaluate a reasonable range of alternatives that meet most of the basic WOD Upgrade Project objectives.

Even if CEQA’s requirements applicable to an EIR’s description of the Proposed Project and analysis of its potential impacts applied equally to an EIR’s description and comparative analysis of project alternatives, the EIS’s alternatives analysis complies with all such requirements. Appendix 5 to the EIS (particularly Attachments 1 and 2 thereto) presents substantial evidence demonstrating that the Phased Build Alternative accurately describes the whole of the action proposed under that alternative, including its ability to accommodate and provide transmission capacity for all reasonably foreseeable electricity generation projects most likely to be in place and operational through the year 2024. That analysis is based in part on CAISO’s 2024 Reliability Base Case. The information in EIS Appendix 5, and in Section A.2.3 (CPUC and BLM Project Objectives), along with General Response GR-4, provides an updated rationale based on the best available evidence as to the realistic level of future new electricity generating facility development in the east Riverside County region.

At its heart, SCE’s argument is for maximizing the size of the project now because at some future date, the need for additional transmission is likely to arise. This type of argument is

true for virtually any infrastructure that may need to increase capacity over time (e.g., bulk transmission lines, highways, water supply systems, and wastewater systems). The balance to be struck in transmission planning is between what is needed for current and reasonably foreseeable projects and the environmental impacts of meeting those needs now, and the unverified needs of speculative projects assumed to be developed at some future date. With regard to timing, SCE ignores the fact that these unknown and speculative future renewable energy projects would each have their own planning, design, review, and approval processes that will take time.

In sum, the EIS accurately, reasonably and consistently describes both the proposed WOD Upgrade Project as well as the Phased Build Alternative thereto, including all future electricity generation that is expected to access the grid as a reasonably foreseeable consequence of the WOD Upgrade Project.

- F1-14 This comment claims that a greater level of environmental impacts would occur with the Phased Build Alternative, when presuming the need for future construction within the corridor after implementing the alternative. See General Response GR-4 on the need for “future phases” of construction under the Phased Build Alternative.

The comment repeats SCE’s concern that wire stringing sites would warrant additional impact analysis. The EIS discloses that the first step of the wire stringing activities is to develop a wire stringing plan that identifies, among other things, the set-up locations for the wire pulling equipment and activity (Section 8.3.3.10). The EIS considers that wire sites can result in an environmental impact due to ground disturbance and other activity within the sites. Response to Comment F1-10 provides additional information on this topic.

- F1-15 The comment asserts that the Phased Build Alternative could result in towers that are not aligned, and that this can lead to conductor blow-out and increased visual impacts. The Phased Build Alternative was derived from the 2005 scenario previously proposed by SCE that would retain the existing double-circuit towers, and this means that the new double-circuit towers would be located next to each existing tower so the spans of both lines would match. Due to SCE’s revised wind loading requirements, replacement of some of the existing double-circuit towers with stronger or higher structures would be necessary (as included in the description of the alternative), and for the new, second set of double-circuit towers, the stronger structure types would be utilized. This would allow the majority of structures to be “soldiered” under the Phased Build Alternative in a manner similar to that of the Proposed Project. This approach avoids SCE’s concerns related to blow-out and visual impacts. The alignment of the new and existing structures has been clarified in Appendix 5, Section 4.4 (description of the Phased Build Alternative).

- F1-16 This comment presents SCE’s opinion that the Phased Build Alternative would not be cost-effective and would delay the in-service date. The EIS provides preliminary information regarding the potential cost of the alternative, for the limited purpose of assessing whether it would be eligible for consideration as an alternative to the Proposed Project. General Response GR-1 notes that the CPUC evidentiary hearing is the appropriate venue for consideration of the cost of the project and alternatives, along with project need.

- F1-17 This comment reviews SCE’s concerns on the potential construction limitations under the Phased Build Alternative, as identified in previous comments and addressed in Responses to Comments F1-14 through F1-16. The comment also identifies potential implementation of a remedial action scheme (RAS) and additional reactive support that may be needed with the

Phased Build Alternative, and characterizes these elements as adding operational complexity. The potential need for these operational elements and future reactive support (of up to 600 MVAR), and the resulting level of operational complexity, are described Response to Comment F1-6.

This comment also asserts that there would need to be additional interconnect structures to mitigate conductor sway and a longer construction period for which the impact analysis did not adequately address. There would be no need for offset structures; the new towers in the Phased Build Alternative are defined as being paired with the existing 220 kV double-circuit structures (see the alternative description in Appendix 5, Section 4.4, Phased Build Alternative). Further, the reader is referred to the response on construction timing of the Phased Build Alternative in Response to Comment F1-10.

- F1-18 This comment provides additional detail on SCE's opinion regarding the cost of the Phased Build Alternative. The EIS provides preliminary information regarding the potential cost of the alternative, for the limited purpose of assessing whether it would be eligible for consideration as an alternative to the Proposed Project. General Response GR-1 notes that the CPUC evidentiary hearing considers the cost of the project, and alternatives, along with its need.
- F1-19 The comment indicates that a greater level of electrical losses would occur with the Phased Build Alternative than would occur with the Proposed Project. This topic is addressed in Responses to Comments B9-4 and B9-11, and Response to Comment B9-4 addresses the potential for line losses to influence generator dispatch, or generator curtailment and the associated economic loss.
- F1-20 SCE states that new engineering and design work could be triggered if the Phased Build Alternative is selected, thereby increasing the time and cost to construct as compared to the Proposed Project. The Draft EIR/EIS describes the basic design and potential construction timelines of the Proposed Project and Phased Build Alternative. In SCE's response to Data Request 17 (ALT-29), SCE presents a construction plan for the Phased Build Alternative and for the Proposed Project, indicating that it is considering the engineering and design process for the Phased Build Alternative. Although SCE has been working to engineer, design, and refine the Proposed Project, the EIS acknowledges that final engineering cannot be complete until the project or an alternative are approved.
- F1-21 SCE requests clarification regarding Mitigation Measures N-1a (Implement best management practices for construction noise) and N-1b (Implement a helicopter noise control strategy), noting that CPUC's authority over transmission construction preempts local ordinances. The EIS has been revised to clarify that SCE has not proposed to request variances for work outside of certain hours, and that SCE would consult with local jurisdictions. Please see Response to Comment F1-2, which addresses this matter.
- F1-22 Please see the Response to Comment F1-3.
- F1-23 Please see the Response to Comment F1-3.
- F1-24 SCE requests that the Visual Resources Mitigation Measure VR-4a be eliminated because CEQA does not require the application of mitigation measures to less-than-significant impacts. While the Draft EIR/EIS analysis found that the majority of the Proposed Project's visual impacts would be less than significant, several locations would have significant



impacts. Also, the Draft EIR/EIS was a joint EIR/EIS, and NEPA requires the application of feasible mitigation even if an impact is less than significant. In the Final EIS, BLM retains this mitigation measure. CEQ guidance provided in *Forty Most Asked Questions Concerning CEQ's NEPA Regulations, Question 19b*, states that "Mitigation measures must be considered even for impacts that by themselves would not be considered significant."

SCE also asserts the mitigation for operational impacts is onerous and that Mitigation Measure VR-8a (Minimize visual contrast in project design) presented in Section D.18.3.3 (Impacts and Mitigation Measures) should not be applied across the entirety of the project. The application of MM VR-8a across the entirety of the Project is appropriate in order to prevent the installation of excessively contrasting project elements. For example, several new transmission projects in recent years have resulted in the installation of structures built of excessively specular (shiny and reflective) steel that was insufficiently dulled in the manufacturing process. The slow pace of natural dulling of these structures results in long-term visual impacts. In at least one case, the application of a post-manufacture colorant was required to reduce structure specularity. The purpose of MM VR-8a is to prevent such an unfortunate post-construction modifications, which are time-consuming and costly. SCE does currently proposes to construct the Proposed Project with structural dulling and use of non-specular materials. If this is properly implemented, MM VR-8a would not impose any additional requirements. The mitigation measure is retained to address any Project design outcomes that are contrary to what has been proposed and described in the Project Description, because such outcomes have occurred on other recent transmission projects.

SCE also asserts that Mitigation Measure VR-9a (Treat structure surfaces) presented in Section D.18.3.3 (Impacts and Mitigation Measures) is not needed because the proposed Project structures and conductors would weather to a dull gray finish. Similar to MM VR-8a discussed above, SCE requests that Mitigation Measure VR-9a be removed from the EIS. However, Mitigation Measure VR-9a is appropriate in order to prevent the installation of excessively contrasting project elements. As noted above, several transmission projects in recent years have resulted in the installation of structures built of excessively specular steel that was insufficiently dulled in the manufacturing process. The slow pace of natural dulling of these structures results in long-term visual impacts. As described above, SCE has proposed to construct the project with use of structural dulling and non-specular materials, and if this occurs, Mitigation Measure VR-9a would not add new requirements. Mitigation Measure VR-9a is retained to address any Project design outcomes that are contrary to what has been proposed and described in the Project Description. Also, because NEPA requires the application of feasible mitigation even if impact is less than significant, it is appropriate to retain Mitigation Measure VR-9a.

F1-25 The commenter argues that solar projects identified in the EIS as connected actions should be analyzed as cumulative impacts. See Response to Comment F1-4.

F1-26 The commenter states that the Phased Build Alternative is not the Environmentally Superior Alternative and should be rejected due to its failure to meet the basic project objectives, its greater environmental impacts, and other aforementioned feasibility issues.

Environmentally superior alternative is a CEQA concept. CPUC's response to this comment is provided here for informational purposes: Please see Responses to Comments F1-1 through F1-25, which provide responses to the commenter's stated issues. The Phased Build Alternative remains environmentally superior to the Proposed Project overall. However, as is

stated in Section G.3 (Comparison Methodology) of the EIS, it is possible that the decision-makers could balance the importance of each impact area differently.

Under NEPA, Section 1505.2(b) requires that the Record of Decision (ROD) must identify all alternatives that were considered, "... specifying the alternative or alternatives which were considered to be environmentally preferable." The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources. The determination of which is the environmentally preferable alternative is a judgment made by BLM.



Comment Set F2 – Southern California Edison

**Attachment A**  
**SCE's Transmission Planning Assessment of the**  
**DEIR/DEIS's Phased Build Alternative**

Attachment A provides a summary of SCE's review of the DEIR/DEIS's Phased Build Alternative. This document concludes that the Phased Build Alternative has serious flaws and that SCE's Proposed Project is superior to the Phased Build Alternative based on several factors, as described below.

F2-1

**1. The DEIR/DEIS Confuses the Conductor Name Plate Capacity With the Maximum Corridor Transfer Capability.**

The conductor name plate provides an indication of the maximum flow that can be carried on the conductor under normal and emergency conditions in the absence of other system limitations. In the case of the West of Devers ("WOD") corridor, the maximum flow capability is approximately 3,000 MW with the use of 795 ACCR conductor and 4,800 MW for the double-bundle 1590 ACSR conductor. This maximum value ensures the power flow stays within the emergency thermal rating of the conductor upon the loss of any two transmission lines west of Devers Substation in accordance with the NERC Reliability Standards, and includes the reliance on a Remedial Action Scheme (RAS) that trips generation so the power flow stays within allowable limits. The 3,000 MW for the 795 ACCR conductor and 4,800 MW for the double-bundle 1590 ACSR is based on conductor name plate limitation and does not take in account any other system conditions.

To determine the actual flow that can be carried on the WOD corridor with the use of a specific conductor, thorough power flow and dynamic stability analyses are required. These complete set of analyses are needed to evaluate other critical system parameters, such as reactive losses, voltage condition, and power angles. As such, the conductor name plate capacity all by itself does not equal system deliverability or capability.

For example, in the power flow analysis conducted by ZGlobal in Case 6, the use of 795 ACCR conductor would limit the flow through the WOD corridor to approximately 1,900 MW due to system voltage instability caused by excessive reactive power losses.<sup>1</sup> This is due to the high impedance of 795 ACCR conductor coupled with the amount of current flowing through the conductor. When the loading through the WOD corridor exceeds the 795 ACCR conductor's Surge Impedance Loading (SIL),<sup>2</sup> the 795 ACCR conductor acts like a shunt reactor - absorbing reactive power (MVAR) from the system, which is referred to as MVAR losses on the line. This results in a decrease in system voltage, leading to a higher

<sup>1</sup> DEIR/DEIS, Appendix 5, Attachment 2, Power Flow Analysis report completed by ZGlobal, Case #6 conclusion, p. 12.

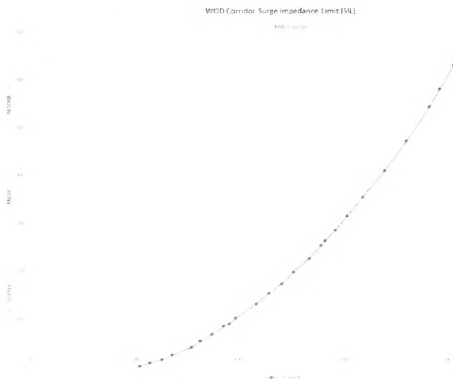
<sup>2</sup> Surge Impedance Loading (SIL) is the MW loading of a transmission line at which a natural reactive power balance occurs.

Comment Set F2 – Southern California Edison (cont.)

potential for system voltage instability. Thus, the 1,900 MW limitation safeguards against system voltage instability due to the excessively high MVAR losses on the 795 ACCR conductor.

F2-1  
cont.

As illustrated in the SIL chart below, the reactive losses on the 795 ACCR conductor are approximately 570 MVAR when the flow through the WOD corridor is approximately 1,900 MW.



In addition to the excessive MVAR losses limiting the maximum flow on the WOD corridor, the higher impedance of 795 ACCR conductor would incrementally increase the flow on the transmission lines parallel to the WOD corridor, such as the Valley – Alberhill 500 kV line. ZGlobal's Case 6 demonstrated that the use of 795 ACCR would increase the loading on the Valley – Alberhill 500 kV line by 4% as compared to the double-bundle 1590 ACSR conductor.<sup>3</sup> The Valley – Alberhill 500 kV line has been identified in previous Generation Interconnection Studies to be the next system limitation for delivering resources west of

<sup>3</sup> The 4% increase is the difference between the loading on Valley – Alberhill on table B2 and B3 provided by ZGlobal in DEIR, Appendix 5, Attachment 2, Appendix A "Analysis results tables & Power Flow Plots," pp. 24 and 26.

**Comment Set F2 – Southern California Edison (cont.)**

Devers Substation, and therefore the use of 795 ACCR conductor would expedite the need for additional system upgrades.

F2-1  
cont.

In contrast, the use of double-bundle conductor doubles the SIL and minimizes the MVAR losses, thus the potential for voltage instability is minimized. In addition, the double-bundle 1590 ACSR conductor has a lower impedance value, which allows higher flow through the WOD corridor under comparable assumptions; up to approximately 3000 MW, before the next system upgrade is triggered.

**2. The ZGlobal Analysis Supporting the Phased Build Alternative Is Flawed.**

F2-2

**A. The ZGlobal Study Misapplies System Reliability Study Methodology to Resource Deliverability Analysis.**

The purpose of performing System Reliability studies is to identify reliability network upgrades needed to serve the study year load forecast. The CAISO's Reliability base cases dispatch generation throughout the CAISO's control grid and limits local renewable resources to certain dispatch levels in an attempt to segregate upgrades required for new generation from upgrades needed to serve load. In other words, the dispatch levels set by the CAISO in the Reliability cases are intended to eliminate any network upgrades needed for new generation and only identify network upgrades needed to meet the study year load forecast. For example, the CAISO's 2024 Reliability Base Case that was used to validate the DEIR/DEIS Phase Build Alternative limits Photovoltaic and Solar Thermal to 36% and Wind resources to 0% of its maximum capability. This way, any reliability network upgrades identified from the CAISO's 2024 Reliability studies would be solely triggered as a result of the need to serve 2024 system load forecast.

In contrast, the CAISO develops Policy Base Cases to identify delivery network upgrade to ensure that generation capacity is not constrained from a Resource Adequacy perspective. The deliverability study methodology simultaneously dispatches all generation resources in a cluster area seeking full deliverability status to identify delivery network upgrades.

Given that the delivery network upgrades cannot be identified in the Reliability base case the conclusion of the DEIR/DEIS that the Phased Build Alternative would provide 2,200 MW of deliverability based on CAISO's 2024 Reliability Base Case<sup>4</sup> is flawed. To adequately determine the actual MW of deliverability that can be achieved by the Phase Build Alternative, a deliverability study is needed that is consistent with the CAISO's deliverability study methodology.

<sup>4</sup> DEIR/DEIS, Appendix 5, Consideration of CEQA/NEPA Criteria under Project Objectives Purpose and Need, p. Ap.5-48.

Comment Set F2 – Southern California Edison (cont.)

- B. The ZGlobal Studies Did Not Demonstrate That the Use of 795 ACCR Conductor As Proposed in the Phased Build Alternative Would Increase System Deliverability by At Least 2,200 MW.

F2-3

The Phased Build Alternative relied on a power flow analysis prepared by ZGlobal, included in Appendix 5 of the DEIR/DEIS, to determine that the alternative conductor (795 ACCR conductor) would increase system deliverability to 2,200 MW. However, none of the ZGlobal Cases demonstrated that the selection of 795 ACCR conductor would actually increase system deliverability by at least 2,200 MW.

ZGlobal's Case 3 was the only Case which concluded that the 795 ACCR conductor is a feasible alternative conductor. However, Case 3 did not properly model Basic Project Objective 1, which is to increase system deliverability by at least 2,200 MW to meet the CAISO's initial group of five solar power generation projects interconnecting at Colorado River and Red Bluff Substations.<sup>5</sup> A detailed review of Case 3 indicates that this Case only assumed 1,387 MW of generation resources at Colorado River and Red Bluff substations, which is significantly less than 2,200 MW identified in the DEIR's Basic Project Objective 1. In addition, today, there are 1,050 MW of generation is on line at Colorado River and Red Bluff substations. Therefore, based on Case 3, only a total of 337 MW of additional new resources could develop at both Colorado River and Red Bluff substations, which is significantly less than 1,929 MW<sup>6</sup> with executed generator interconnection agreements at this time.

Assuming only 337 MW of new generation at Colorado River and Red Bluff Substations significantly downplays the importance of both the Colorado River and Red Bluff Substations for interconnecting new renewable resources. The unrealistically low level of generation at Colorado River and Red Bluff Substations ignores the resources currently under development. The renewable generation projects are aligning their in-service dates with completion of the WOD Upgrade Project to minimize potential curtailments and obtain Full Capacity Deliverability Status (FCDS).<sup>7</sup>

Furthermore, with the inclusion of Cluster 8, there are sixteen (16) generation projects totaling 6,072 MW, which would all require the WOD Upgrade Project to support FCDS. Five (5) projects have executed GIAs with SCE for a total of 1,859 MW that require the WOD Upgrade Project for FCDS.

<sup>5</sup> DEIR/DEIS Executive Summary, Basic Project Objective 1, p. ES-6.

<sup>6</sup> The 1,929 MW consist four projects (Q294, 365, 576, and 643AE), totaling 1,359MW, require the WOD upgrades for FCDS and two projects (Q17 and 219) totaling 570MW that would increase the flow on the WOD corridor.

<sup>7</sup> Refer to the generation projects letters provided in SCE's testimony and in SCE's response to data request ALT-17D

Comment Set F2 – Southern California Edison (cont.)

In addition, Base Project Objective 1<sup>8</sup> indicates that the Phase Build Alternative would provide FCDS to generation listed in Table Ap.5-3 of Appendix 5 and this conclusion was satisfied by utilizing the CAISO's 2024 Reliability Base Case (Case 3). Table Ap.5-3 includes 10 generation projects, totaling 3,029 MW, with an interconnection request to Colorado River and Red Bluff Substations. Case 3 limits the generation resources dispatched at Colorado River and Red Bluff Substations to 1,387 MW and therefore does not demonstrate that the Phase Build Alternative would provide FCDS to generation listed in table Ap.5-3.

F2-3  
cont.

Based on the reasons above, Case 3 does not demonstrate that 795 ACCR conductor would meet the Basic Project Objective 1 of increasing deliverability to at least 2,200 MW for those resources which are seeking interconnection at the Colorado River and Red Bluff Substations.

The DEIR/DEIS Phased Build Alternative's failure to meet the Basic Project Objective 1 of increasing deliverability to 3,000 MW of the output from new generation projects<sup>9</sup> is further revealed to be flawed by reviewing the ZGlobal studies for Case 6. Case 6 modeled the use of 795 ACCR conductor and included approximately 2,628 MW of new not yet existing generation resources at Colorado River and Red Bluff Substations. ZGlobal concluded that the use of 795 ACCR conductor under the Case 6 study assumptions was "not technically feasible." (ZGlobal)<sup>10</sup> This conclusion clearly states that the use of 795 ACCR conductor cannot possibly accommodate 2,628 MW of new generation at Colorado River and Red Bluff Substations.

Given that Case 3 was based on an incorrect assumption of the generation levels at Colorado River and Red Bluff Substations, and Case 6 concluding that the 795 ACCR is "not technically feasible," the power flow analysis conducted by ZGlobal failed to demonstrate that the 795 ACCR alternative conductor would meet the DEIR/DEIS's stated Objective 1.

F2-4

C. ZGlobal Misrepresented the MW Capacity That Require the WOD Upgrades.

The following statement by ZGlobal is incorrect "This leaves approximately 1881 MW requiring the WOD upgrades – a greater than 300 MW decrease from the original TC Study requirement of 2200 MW".<sup>11</sup>

The DEIR/DEIS interpreted the CAISO's response out of context. Generation projects listed in Table 1 in the CAISO's response only includes projects in the queue that would

<sup>8</sup> DEIR/DEIS, Appendix 5, Basic Project Objective 1, p. Ap.5-48.

<sup>9</sup> DEIR/DEIS, Appendix 5, Project Objectives Purpose and Need section, p. Ap.5-48.

<sup>10</sup> DEIR/DEIS, Appendix 5, Attachment 2, Power Flow Analysis report completed by ZGlobal, Case #6 conclusion, p. 12.

<sup>11</sup> DEIR/DEIS, Appendix 5, Attachment 2, A Power Flow Analysis report provided by ZGlobal, p. 6.

**Comment Set F2 – Southern California Edison (cont.)**

be adversely impacted by a delay to the WOD Upgrade Project. This list did not include projects that were granted FCDS with the existing facilities or FCDS with the inclusion of the Interim WOD Project. While those projects that are currently utilizing the Interim WOD Project would not be adversely impacted by a delay in the project, they ultimately need the WOD Upgrade Project. The Interim WOD Project is a temporary mitigation solution that is not electrically compatible with the WOD Upgrade Project and would be removed upon completion of the WOD Upgrade Project. Therefore, the 1,881 MW assumption must additionally account for two Transition Cluster projects (Q193, and 294) totaling 985 MW that would need a solution robust enough to grant the requested FCDS to these two projects on a permanent basis. As such, the WOD Upgrade Project must provide FCDS for at least 2,866 MW (1,881 MW described by ZGlobal and 985 MW for Q193 and Q294) and not 2,200 MW as described in Basic Objective 1.

F2-4  
cont.

In addition, the capacity provided by the WOD Upgrade Project should not be limited to 2,866 MW. Instead, it should be designed to provide additional transfer capability for future developments such as new generation resources seeking interconnection to Red Bluff and Colorado River Substations as part of Queue Cluster 8. Currently, there are seven (7) projects in CAISO's Cluster 8, totaling over 3,600 MW that submitted interconnection requests seeking FCDS for their proposed generation facilities. These new generation projects would also rely on the WOD Upgrade Project to support FCDS. Therefore, the use of 795 ACCR conductor does not provide adequate support for expected generation developments at both Colorado River and Red Bluff Substations.

**D. The DEIR/DEIS Made Flawed Assumption About the WOD Upgrade Project Based Upon the Entire CAISO Queue.**

F2-5

The following statement made in the ZGlobal analysis is inapplicable to the WOD Upgrade Project: "The CAISO queue overall, through Cluster #7, had approximately 1179 projects submitted. The number of projects withdrawn is 892. That represents a nearly 76% drop out rate. Of the 1179 projects submitted for study by the CAISO, 97 have gone commercial, or ~ 8%."<sup>12</sup> The use of a 76% dropout and 8% commercial rate as blanket assumptions of what future generation will develop at Colorado River and Red Bluff Substations are flawed assumptions. Using the assumption that only 8% of the generation projects would be developed and stating that SCE's Proposed Project would be underutilized would lead to under-sizing the project as opposed to right-sizing the project to meet the need of renewable generators in the area.

Comparative analysis of the development of the WOD Upgrade Project to the development of SCE's Tehachapi Renewable Transmission Project (TRTP) shows why the use of blanket assumptions across the board are misleading assumptions. In the case of TRTP, a total of 73 projects that would utilize TRTP sought interconnection at the 220 kV voltage level. Of those 73 projects, 38 projects have withdrawn and 13 projects have already gone commercial with 8 additional projects currently under construction. In

<sup>12</sup> DEIR/DEIS, Appendix 5, Attachment 2, p. 6.

**Comment Set F2 – Southern California Edison (cont.)**

contrast to the overall CAISO dropout rate, SCE has seen only a 52% dropout rate and a 18% commercial rate that will increase to 29%, both of which are significant improvements to the 76% dropout rate and 8% commercial rate included in the DEIR/DEIS. In fact, based on the number of interconnection request in the Tehachapi area, the TRTP will be fully utilized once its construction is completed. This further demonstrates that generation projects develop where transmission line capacity is available. Another example is the Eldorado – Ivanpah Transmission Project (EITP). The EITP had a total of 18 projects with interconnection requests that would require the EITP upgrade. Of those 18 projects, 7 projects have withdrawn and 3 projects have gone commercial with 3 additional projects that are currently under construction. Again, in contrast of the overall CAISO dropout rate, the EITP has a 39% dropout rate and 33% commercial rate. These figures clearly demonstrate that a blanket assumption based on statistics of the entire queue are not applicable across the board and that the rates are expected to improve in areas where transmission projects, such as the WOD Upgrade Project, are developed.

F2-5  
cont.

**3. The Phased Build Alternative Would Fail to Meet the Project Objectives.**

F2-6

**A. The Phased Build Alternative Would Fail to Fulfill the DEIR/DEIS Basic Project Objective 2.**

The Phase Build Alternative would not fulfill Basic Objective 2 since this alternative significantly limits the corridor's transfer capability. In evaluating the Phase Build Alternative, the DEIR/DEIS analysis demonstrates that the corridor capacity (actual power flow capability) would be limited to approximately 1,900 MW (per ZGlobal Case 6 Studies). As a result of limiting the corridor capability, the Phased Build Alternative would introduce a barrier to the achievement of State and Federal renewable energy goals and would accelerate the need to again upgrade the WOD corridor. Footnote 2 on Ap. 5-53 of the Appendix 5 in the DEIR/DEIS indicates that since the Phased Build Alternative is a smaller upgrade to the SCE Proposed Project, the renewable resources portfolio might be shifted from Riverside East Renewable Energy Zone to different zones based on RPS Calculator V.5. The need to shift resources from one renewable energy zone to another when performing the Deliverability Analysis is a clear indicator that the use of the 795 ACCR conductor in the Phase Build Alternative creates a barrier to the integration of resources in the Riverside East area. SCE's Proposed Project provides sufficient transfer capability on the WOD Corridor, allowing significantly more renewable generation to be developed and delivered from the Riverside East zone to the LA Basin load centers. In order to meet Basic Objective 2, the WOD Upgrade Project should be designed to maximize the corridor capacity consistent with prudent long-term planning, the State's greenhouse gas reduction goals, and renewable energy goals, while taking into account the overall environmental and cost impacts.



Comment Set F2 – Southern California Edison (cont.)

B. The Phased Build Alternative Would Fail to Meet the DEIR/DEIS Basic Project Objective 3.

F2-7

The inclusion of Basic Project Objective 3 in the DEIR/DEIS suggests that the CPUC and BLM recognize that the WOD corridor is a critical path for renewable development in the Riverside East and Imperial Valley zones. Such identification has been made in several regional studies such as DRECP,<sup>13</sup> PEIS<sup>14</sup> and the CPUC's LTTP,<sup>15</sup> yet the proposed Phased Build Alternative limits the corridor transfer capacity. SCE agrees with the premise that it is important to maximize the availability of remaining space in the corridor to the extent practicable, so future use of the corridor for additional transmission lines is not precluded. However, it is critical to first maximize the capacity of any initial upgrade undertaken within this critical corridor, and do so in a manner that is the least environmentally impactful and reduces costs taken as a whole. Then and only then should project goals ensure that the future use of the corridor is not precluded. In essence, following the Garamendi Principles and ensuring capacity is maximized within the corridor by utilizing the SCE proposed double-bundle 1590 ACSR conductor would eliminate the need to build the next phase, thus reducing environmental impacts and costs and would also defer the need for a new 500 kV or 220 kV transmission lines through the WOD corridor until State policy goals and/or generator development triggers the additional need.

In addition, the Phased Build Alternative was proposed with the understanding that an expansion to the corridor would likely be needed in the near future.<sup>16</sup> The fact that the Phased Build Alternative would be constructed only to have to be torn-down within a few years after construction is not indicative of good transmission planning practices.

Given that it is anticipated that more generation projects will come online during the construction time frame of the initial phase of the Phased Build Alternative, taking the transmission lines in the WOD corridor out of service again for construction of the next phase of upgrades would require significant generation curtailment during construction.

SCE's Proposed Project, would maximize the existing transmission corridor transfer capability to meet California's long-term needs in light of the State's numerous environmental goals. SCE designed the project in a manner to minimize future environmental impact and waste associated with multiple tear-down and rebuild activities.

<sup>13</sup> Transmission Technical Group Alternative 5.

<sup>14</sup> Final Programmatic Environmental Impact Statement, Vol. 2, pp. 9.4-143.  
[http://www.blm.gov/wo/st/en/prog/energy/geothermal/geothermal\\_nationwide/Documents/Final\\_PEIS.html](http://www.blm.gov/wo/st/en/prog/energy/geothermal/geothermal_nationwide/Documents/Final_PEIS.html).

<sup>15</sup> Assigned Commissioner's Ruling on Assumptions, Scenarios, and Portfolios of February 27, 2014 in R.13-12-010.

<sup>16</sup> DEIR/DEIS, Cumulative Scenario and Impact, Future 500 kV Transmission line in WOD corridor, p. E-13.



**Comment Set F2 – Southern California Edison (cont.)**

**4. The Phased Build Alternative Would Create Unacceptable Outcomes.**

F2-8

**A. The Phased Build Alternative Would Inappropriately Reduce and Change SCE's Project Objectives.**

In the Proponent's Environmental Assessment (PEA), and as updated in the April 17, 2015 testimony, SCE explained that the purpose of the WOD Upgrade Project was to eliminate the limited transmission transfer capability that currently exists on the transmission lines that connect the Devers Substation to the El Casco, San Bernardino, and Vista Substations in order to:

- Integrate Planned Generation Resources
- Comply with terms of Generator Interconnection Agreements that SCE has entered into with various generators
- Facilitate the FCDS of new electric generation resources being developed in the Blythe and Desert Center Areas
- Facilitate Progress Toward Achieving Renewables Portfolio Standard Goals By Providing Transmission Upgrades to Deliver Renewable Generation in Blythe and Desert Center Areas
- Accommodate increased flows from Path 42
- Enable Distributed Generation (DG) in the Devers area to achieve FCDS
- Support Integration of Small Scale Generation
- Support California's GHG Reduction Program
- Support Goals of the CEC integrated energy policy report
- Support Desert Renewable Energy Conservation Plan
- Support the power flow increase associated with the proposed Delaney-Colorado River 500 kilovolt (kV) project

The DEIR/DEIS dismisses the majority of these objectives, and then further reduces the Proposed Project's purpose and need.

The DEIR/DEIS's Basic Project Objective 1, for example, limits the system deliverability increase to the initial five solar power generation projects totaling 2,200 MW from the CAISO's transition cluster, ignoring the fact that transmission capacity is required for subsequent generation development in the Blythe and Desert Center areas for these resources to achieve the FCDS.

Basic Project Objective 1 would not allow for additional transfer capacity that is reasonably expected to be required and adversely impacts the following West of Devers

**Comment Set F2 – Southern California Edison (cont.)**

Upgrade Project's Purpose and Need:<sup>17</sup>

- Maximize import capability (MIC) out of IID
- Provide for the requested FCDS of seven (7) WDT projects totaling 108 MW seeking interconnection in the Devers and Valley areas  
Provide for deliverability to Distributed Generation located in the Devers area
- Provide additional transfer capability to accommodate the flow increase due to CAISO's approved Delaney-Colorado River 500 kV project. The Delaney-Colorado River project would help to support the deliverability for generation projects located in the Imperial Valley area
- Support reasonably expected generation development beyond the five Transition Cluster generation projects initially identified to trigger the need for the WOD Upgrade Project
- Support California's GHG Reduction Program

F2-8  
cont.

**B. The Phased Build Alternative Would Trigger Additional Transmission System Upgrades That Were Not Evaluated in the DEIR/DEIS.**

As noted in the Consideration of CEQA/NEPA Criteria Section,<sup>18</sup> the Phased Build Alternative relied on a Power Flow Analysis prepared by ZGlobal to determine if the alternative conductor (795 ACCR conductor) would increase the system deliverability by 2,200 MW. The results of Case 6 concluded that the proposed 795 ACCR conductor is in fact NOT technically feasible to increase system deliverability without additional system upgrades. However, these additional upgrades were not considered in the DEIR/DEIS. Case 6 shows that the implementation of a RAS and the installation of 600 MVAR shunt capacitance, consisting of several smaller capacitor banks installed at undisclosed locations, would be required with the use of the 795 ACCR conductor. These facilities are not required as part of SCE's Proposed Project that uses a double-bundle 1590 ACSR conductor to meet the generation interconnection request up to cluster 7. Case 6 modeled the use of 795 ACCR conductor, assumed use of a RAS, added 600 MVAR of reactive support at undisclosed locations, and included approximately 2,628 MW of new not yet existing generation resources at Colorado River and Red Bluff Substations. These additional upgrades need to be evaluated in the DEIR/EIS as they would have environmental, schedule, cost impacts, and may not even be feasible given large size and limited substation land availability. Moreover, the conclusion of Case 6 demonstrates that the use of a 795 ACCR conductor is extremely short-sighted as it does not adequately support expected generation developments at both Colorado River and Red Bluff substations.

F2-9

<sup>17</sup> As described in SCE's Proponents Environmental Assessment Chapter 1, and updated in SCE's April 17, 2015 testimony.

<sup>18</sup> DEIR/DEIS, Project Objectives Purpose and Need section, p. Ap.5-48.

Comment Set F2 – Southern California Edison (cont.)

C. The Phased Build Alternative Would Adversely Impact the Fundamental Project Purpose of Integrating Planned Generation Resources.

F2-10

At the time SCE prepared its PEA, the CAISO and SCE generation interconnection studies identified ten (10) generation projects totaling 2,479 MW that required the Proposed Project to obtain FCDS, of which three projects had executed GIAs with SCE for a total of 1,485 MW. Currently, the inclusion of Cluster 8 and modifications to prior queued projects details are provided below, the number of the interconnection requests has increased to sixteen (16) generation projects, totaling 6,072 MW. The WOD Upgrade Project as proposed would be required to provide FCDS for these 16 generation projects.<sup>19</sup> Given the limitations of transfer capability corresponding to the use of 795 ACCR conductor for the Phased Build Alternative, the amount of deliverability is significantly reduced in comparison to SCE's Proposed Project, creating a barrier for renewable development in the Colorado River and Red Bluff substation areas. Thus, the proposed WOD Upgrade Project is a critical project for renewable development in the Riverside East and Imperial Valley. The total designated Renewable Resource Portfolio for Riverside East and Imperial area to meet 33% by 2024 is 4,767 MW. The Phase Build Alternative would become an impediment in achieving and maintaining California's 33% RPS and for the further increase to 50% renewables as required under SB 350.

Details of the changes that affect the generation interconnection information provided in the PEA are:

- Two generation projects, totaling 985 MW (Q193 and Q294), were granted FCDS on a temporary basis via the Interim West of Devers Project. The Interim West of Devers Project will be removed after the completion of the Proposed Project as it would provide no additional capacity or benefits to the system. Therefore, the capacity provided by the WOD Upgrade Project must account for these projects.
- Five generation projects which include the two projects granted FCDS on a temporary basis, totaling 1,859 MW, have executed LGIAs. See Table 1.1
- Two generation projects, totaling 200 MW which have requested FCDS are in GIA negotiation.<sup>20</sup> See Table 1.2
- Two new generation projects (Cluster 7), totaling 400 MW have requested FCDS for their proposed generation facilities. These new generation projects require the WOD Upgrade Project to achieve FCDS. LGIAs for these two projects are currently expected no later than December 2016.<sup>21</sup> See Table 1.3

<sup>19</sup> Some projects may require additional upgrades beyond the WOD Upgrade Project to achieve the FCDS and would be determined by CAISO.

<sup>20</sup> Q421 has made the first and second required financial posting. Q790 has made the initial financial security posting and the project is currently parked waiting for TP deliverability allocation.

<sup>21</sup> Cluster 7 projects have provided their interconnection financial security in accordance with the CAISO tariff. This posting was due 90 days after the completion of its Phase 1 study, the second posting shall be made 180 calendar days after the issuance of the final Phase 2 interconnection study report.

**Comment Set F2 – Southern California Edison (cont.)**

- Seven new generation projects (Cluster 8), totaling over 3,600 MW have submitted interconnection request where the Interconnection Customers have requested FCDS for their proposed generation facilities. These new generation projects would also rely on the WOD Upgrade Project to support FCDS. See Table 1.4.
- Two generation projects (Q588 and Q797) have withdrawn from the interconnection process.
- Three generation projects, totaling 720 MW (Q17, Q219, and Q138) have executed GIAs, which impact flows and need to be accounted for even though they do not rely on the WOD Upgrade Project for FCDS. See Table 1.5.

The resulting MW capacity of the generation projects requesting interconnection to Colorado River and Red Bluff substations depend on the proposed WOD Upgrade Project to support FCDS increased from 2,479 MW to 6,072 MW, of which 1,859 MW have executed GIAs.

Given the large amount of impending generation projects in CAISO's queue in the Colorado River and Red Bluff Substation areas, permitting for a subsequent expansion of the WOD corridor would need to be initiated prior to completion of construction of the Phased Build Alternative.

**Table 1.1**  
**Interconnection Projects Require the WOD Upgrades**  
**for FCDS With Executed LGIAs**

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
294	Solar PV	Colorado River 220 kV Bus	485	LGIA – Executed In-service date: 12/2016-2/2020
365	Solar Thermal	Red Bluff 220 kV Bus	500	LGIA - Executed In-service date: 12/2020-11/2021
193	Solar PV & Solar Thermal	Colorado River 220 kV Bus	500	LGIA - Executed Already in-service
576	Solar PV	Colorado River 220 kV Bus	224	LGIA – Executed In-service date: 09/2018
643AE	Solar PV	Red Bluff 220 kV Bus	150	LGIA – Executed In-service date: 08/2019

F2-10  
cont.

Comment Set F2 – Southern California Edison (cont.)

Total	1,859 MW
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Table 1.2

Interconnection Projects Require the WOD Upgrades  
for FCDS Under GIA Negotiation

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
421	Solar PV	Red Bluff 220 kV Bus	50	LGIA - Under Negotiation Propose In-service date: 12/2020
970	Solar PV	Colorado River 220 kV Bus	150	LGIA – Under Negotiation* Propose In-service date: 09/2018
Total			200 MW	

\* LGIA is pending as a result of the IC's election to "Park" the project until the 2016 TP Deliverability Allocation

Table 1.3

Interconnection Projects Require the WOD Upgrades  
for FCDS in Phase 2 Study

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
1070	Solar PV	Red Bluff 220 kV Bus	250	Study Phase-QC7 Phase II Propose In-service date: 12/2018
1071	Solar PV	Colorado River 220 kV Bus	150	Study Phase-QC7 Phase II Propose In-service date: 5/2019

F2-10  
cont.

**Comment Set F2 – Southern California Edison (cont.)**

Total	400 MW
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F2-10  
cont.

**Table 1.4**  
**Interconnection Projects Would Depend on the**  
**WOD Upgrades for FCDS in Phase 1 Study**

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
1194	Natural Gas	Colorado River 220 kV Bus	600	Study Phase-QC8 Phase 1 Propose In-service date: 6/2020
1192	Solar PV	Colorado River 220 kV Bus	463	Study Phase-QC8 Phase 1 Propose In-service date: 12/2020
1198	Solar PV	Colorado River 220 kV Bus	150	Study Phase-QC8 Phase 1 Propose In-service date: 12/2020
1196	Solar PV	Colorado River 220 kV Bus	400	Study Phase-QC8 Phase 1 4/2022
1193	Hydro Pump Storage	Red Bluff 220 kV Bus	1400	Study Phase-QC8 Phase 1 Propose In-service date: 1/2022
1200	Solar PV	Red Bluff 220 kV Bus	200	Study Phase-QC8 Phase 1 12/2018
1197	BAT	Red Bluff 220 kV Bus	400	Study Phase-QC8 Phase 1 Propose In-service date: 9/2018
Total			3,613 MW	

Comment Set F2 – Southern California Edison (cont.)

**Table 1.5**  
**Interconnection Projects Would Impact the Flow on the WOD Corridor**  
**With Executed GIAs**

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
17	Combined Cycle	Colorado River 500 kV Bus	520	LGIA – Executed Propose In-service date: 1/2018
138	Wind Turbine	Devers – Vista No.1 220 kV Line	150	LGIA – Executed Propose In-service date: 9/2020
146	Solar PV	Red Bluff 220 kV Bus	150	LGIA – Executed Already in-service
147	Solar PV	Red Bluff 220 kV Bus	400	LGIA – Executed Already in-service
219	Combined Cycle	Colorado River 500 kV Bus	50	LGIA – Executed Propose In-service date: 1/2018
Total			1,270 MW	

F2-10  
cont.

D. The Phased Build Alternative Would Increase the Power Losses Throughout the System.

The use of 795 ACCR conductor would increase the power losses through the WOD corridor and throughout the system compared to the use of double-bundle 1590 ACSR conductor. Given the 795 ACCR conductor resistance is almost four times larger than the double-bundle 1590 ACSR conductor and the power losses are a function of the conductor resistance and the square of the line current, as compared with the double-bundle 1590 ACSR conductor the use of 795 ACCR conductor would increase the system power losses by 62 MW when those lines are operating to their maximum line current

F2-11

**Comment Set F2 – Southern California Edison (cont.)**

capability. Out of 62 MW losses throughout the system, approximately 30 MW is lost through the WOD corridor.<sup>22</sup>

F2-11  
cont.

**E. The Phased Build Alternative Would Create Operational Complexity.**

F2-12

The proposed Phased Build Alternative would require the implementation of a RAS to trip generation projects to mitigate instability and thermal overloads along with the installation of a large amount of reactive support. In addition, the implementation of a RAS as a result of limited transfer capability provided by the Phased Build Alternative may trigger the need for generation curtailment to maintain generation tripping up to the CAISO planning standard of 1,400 MW (as defined in the ISO Transmission Planning Standards ISO SPS3).

In contrast, SCE's Proposed Project would provide sufficient transfer capability to meet the immediate and imminent system needs up to cluster 7 (2,459 MW) without any additional upgrades.

**F. The Phased Build Alternative Would Adversely Impact Generation Developments.**

F2-13

Given that the Phased Build Alternative would require new engineering and design work, a delay to the completion of the project would occur. SCE anticipates that if the CPUC ultimately selects the Phased Build Alternative, there would be a two-year delay to the project. As discussed in the PEA and the associated data requests, a delay to the completion of the WOD Upgrade Project would adversely impact generation development for the following reasons:

- Delay to the development of renewable resources, since the WOD upgrade is required for generation achieve FCDS.
- Possible impact to ongoing Power Purchase Agreement negotiations
- Potential failure for generators to comply with the terms of existing PPAs.
- Likely present financial adversity to generation projects and threaten the viability of generation development.
- A delay to the WOD Upgrade Project may cause generation projects to postpone their respective commercial operation dates to align with a modified WOD project timeline, potentially adversely impacting such projects' environmental studies, permits, and financial obligations/opportunities.
- Possible delay to increase MIC for IID, consequently, place at risk the financial viability of generation development in the IID area that is dependent upon the MIC increase to meet existing PPA terms and/or the terms of ongoing PPA negotiations.

<sup>22</sup> The actual line losses would vary based on a number of factors including, for example, the amount of energy flowing through the lines, the ambient conditions such as temperature and wind speed, and the duration of various levels of current flow.



**Comment Set F2 – Southern California Edison (cont.)**

Please refer to the generation projects letters provided in SCE's testimony and in SCE's response to data request ALT-17D to better understand the potential impacts to the generation projects in the Eastern area from the possible delay to the WOD Upgrade Project.

**F2-13  
cont.**

A-17

## Responses to Comment Set F2 – SCE’s Attachment A

F2-1 SCE’s comments assert that the power flow modeling by ZGlobal is flawed. In general, the EIS does not need to attempt to resolve the differences in opinion between SCE and ZGlobal on the adequacy of the Phased Build Alternative or the methodology of the analysis disclosed in the Draft EIR/EIS. The EIS includes a sufficient degree of analysis to provide decision makers with information which enables them to make a decision that takes account of environmental consequences. The following individual responses aim to clarify how the technical study of the Phased Build Alternative is used and presented within the EIS.

This comment identifies technical concerns related to the capabilities of the Phased Build Alternative’s 795 Aluminum Conductor Composite Reinforced (ACCR) conductors and the electrical properties of this type of conductor in the context of the system.

The comment asserts that the Draft EIR/EIS confuses the conductor name plate capacity with maximum corridor transfer capability. The EIS does not include any reference or use of the term “name plate” capacity. The description of capabilities in Appendix 5, Section 4.4 (Phased Build Alternative) focuses on whether the alternative could satisfy Basic Project Objective 1, to increase system deliverability. The EIS clearly discloses that the Phased Build Alternative would have lower power flows and a lower corridor transfer capability than the Proposed Project (Appendix 5, Attachment 1 and Attachment 2), as noted in Response to Comment F1-8.

The comment describes the results of the ZGlobal power flow modeling Case #6 (in EIS Appendix 5, Attachment 2) as illustrative of the electrical performance limitations of the Phased Build Alternative. The comment points to this case and indicates that to determine the “actual flow” that can be carried on the West of Devers corridor would require a more complete set of power flow and dynamic stability analyses.

In contrast with the assertion made by the comment, the ZGlobal analysis does include a thorough power flow analysis and voltage analysis. The analysis does not include a dynamic stability analysis, which would generally be warranted if power flow analysis shows major overloads and significant voltage violations in the area under study. The power flow analysis represents a first level screening tool that determines whether a dynamic stability analysis would be needed or not. Because Case #3 of the modeling did not indicate major problems in the system with the 795 ACCR conductor, ZGlobal did not perform additional dynamic stability analysis. The limitations described in this comment are from SCE’s review of Case #6, although the power flow modeling conclusion for Case #6 notes that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p. 12).

The comment discusses the Surge Impedance Loading (SIL) capabilities of the 795 ACCR conductors compared with the Proposed Project conductors, which would allow greater SIL. In contrast with other properties specified during transmission system planning, SCE notes this is one technical factor normally considered during the process of transmission line design. The SIL capabilities indicate how a particular conductor absorbs reactive power, or mega-volt-amps reactive (MVAR) power, which can lead to a decrease in system voltages and an increase in the potential for system voltage instabilities. Any given conductor will consume reactive power when loaded above SIL, but reactive power losses can be compensated by

using available capability within generators, capacitors, or other means of compensation, and if necessary, by adding new reactive power devices.

Technical review by ZGlobal indicates that the MVARs consumed by the four circuits of the West of Devers corridor using 795 ACCR conductor would be as follows:

■ Devers-Vista	72 MVARs
■ Devers-San Bernardino	49 MVARs
■ Devers-El Casco-San Bernardino	50 MVARs
■ Devers-TOT185HS-Vista	72 MVARs
■ Total:	243 MVARs

This means that the total of 570 MVARs mentioned in SCE comment regarding the Phased Build Alternative may be an overstatement of these losses.

The comment concludes by stating that reactive power losses and the higher impedance of the 795 ACCR conductors when compared with the Proposed Project conductors would expedite the potential for future system upgrades becoming necessary. This is not an indication of infeasibility. Instead, the comment reflects SCE's view that the Phased Build Alternative would not satisfy system needs. See General Response GR-1 on the level of project need.

Also see previous individual responses (including Responses to Comments F1-10 through F1-15) that discuss the conclusion made in the Draft EIR/EIS that the Phased Build Alternative is "potentially feasible" and eligible for consideration within an EIS. Additionally, Responses to Comments F1-6, F1-7, and F1-8 address the performance of the Phased Build Alternative in the various power flow modeling cases.

F2-2

The comment states that the methodology of system reliability studies has been misapplied as a means of determining deliverability. Response to Comment F1-8 provides details on how the 2024 Reliability Base Case is used within the EIS, and how the EIS focuses on determining whether the alternative is feasible.

In conjunction with the statement that the use of the 2024 Reliability Base Case is flawed, the comment notes that a deliverability analysis would need to be prepared in a manner consistent with the CAISO's deliverability study methodology. This comment is raised elsewhere, and Response to Comment F1-8 clarifies how additional information would be needed to determine the actual level of generation deliverability, in MW, provided by the Phased Build Alternative. Additionally, General Response GR-2 notes that the power flow analysis in the EIS does not include a formal study of deliverability. Instead, given NEPA requirements for alternatives, the EIS focuses on determining whether the alternatives are feasible.

The CAISO comments on the Draft EIR/EIS (Comment B9-8) indicate CAISO's intent to conduct a comparative analysis of project alternatives using the CAISO's deliverability study methodology, and CAISO intends to present its results in testimony in the CPUC general proceeding (A.13-10-020).

Additional discussion in General Response GR-2 and other individual responses to SCE comments clarify how the Phased Build Alternative would be a potentially feasible means of satisfying most or all of the objectives.

- F2-3 SCE's comment states that the ZGlobal power flow modeling did not demonstrate an increase in system deliverability by at least 2,200 MW, as set forth in Basic Project Objective 1. See General Response GR-2 on the ability of the Phased Build Alternative to satisfy Basic Project Objective 1. General Response GR-2 also notes that the power flow analysis in the EIS does not include a formal study of deliverability.

The comment correctly notes that the 2024 Reliability Base Case and power flow analysis Case #3 includes generation producing 1,387 MW at Red Bluff and Colorado River Substations (details in Table A4 of EIS Appendix 5, Attachment 2, p. 21). This level of online power generated is a representation of 3,853 MW of installed renewable resource capacity at these interconnection points accounting for the 36 percent capacity factor of the case. Although the SCE comment disagrees with the level of generation modeled, the comment does not contradict the EIS conclusion that the Phased Build Alternative satisfies the level of generation modeled with the Reliability Base Case in modeling Case #3 (EIS Appendix 5, Attachment 2, p. 10). The power flow analysis of Case #3 also includes the import of 1,400 MW from IID.

The comment claims that incorrect generation levels are used in the power flow modeling. All generation assumptions within the CAISO's Cluster 7, Phase I, 2019 base case and the 2024 Reliability Base Case were unchanged from what was available on the CAISO's website (as disclosed in the EIS Appendix 5, Attachment 2, p. 7), and these were the most up-to-date base cases available on the CAISO's secure website at the time that the Draft EIR/EIS was prepared. The scenarios were selected prior to the availability of Cluster 8 case data; however, while conditions have changed and will continue to change, the EIS accurately recognizes that the interconnection queue changes often.

Responses to Comments F1-6, F1-7, and F1-8 address the performance of the Phased Build Alternative in the various power flow modeling cases.

- F2-4 The comment states that a greater level of generation requires the Proposed Project than the levels tabulated by the power flow modeling report. The values that lead to 1,881 MW of generation, as a subset of those identified in the CAISO response to the data request, are shown in EIS Appendix 5, Attachment 2, p.6. See General Responses GR-1 and GR-2 regarding need.
- F2-5 The comment states that the discussion of the interconnection queue that appears in the power flow modeling report does not apply to the Proposed Project. The system-wide data presented in EIS Appendix 5, Attachment 2, p.6 are not disputed by the comment, which focuses on projects occurring within specific corridors. The data in the EIS are illustrative of the potential for generation projects to withdraw, and no further clarifications are necessary.
- F2-6 The comment asserts that the Phased Build Alternative would fail to fulfill the EIS Basic Project Objective 2. General Response GR-3 provides further information on the ability of the Phased Build Alternative to satisfy Basic Project Objective 2. General Response GR-3 also discusses the renewable energy portfolios as they relate to the Proposed Project and the alternative.

The comment also restates SCE's opinion that the Proposed Project should "maximize the corridor capacity." This contrasts with SCE's stated Project Objective to "maximize the use of the existing transmission line rights-of-way," which is interpreted as EIS Basic Project Objective 3 to maximize the availability of remaining space in the corridor. General Response GR-2 notes that the objectives listed by SCE in its PEA for the Proposed Project included no minimum generation level goals or a minimum targeted capability for the corridor.

- F2-7 The comment asserts that the Phased Build Alternative would fail to meet the EIS Basic Project Objective 3. The EIS assesses the goal of maintaining adequate space within the corridor in the consideration of Basic Project Objective 3, and Basic Project Objective 3 is qualitative in nature. General Response GR-2 also provides a discussion of the agency-specific Basic Project Objectives.

The analysis in the EIS (Appendix 5, Section 4.4, p. Ap.5-54) shows that sufficient space would remain available for expansion, while recognizing that less space would be available under the alternative. Consideration of the programs, including Desert Renewable Energy Conservation Plan ("DRECP"), the BLM Solar Programmatic EIS (PEIS), and the CPUC's Long Term Procurement Planning process (LTTP), that drive the need to add future transmission in the corridor appears throughout the EIS, notably in the cumulative scenario (Section E.2.3.1, Background).

The comment clarifies SCE's proposal to "maximize the capacity" of the upgrades within the corridor. However, this goal is different from the second of SCE's six project objectives, which is to "maximize the use of existing transmission line rights-of-way to the extent practicable." The EIS reflects the goal that increasing the capacity of the WOD transmission lines directly improves the ability for numerous renewable generation projects to interconnect (EIS, Section A.2.3). Accordingly, and consistent with the Garamendi Principles, Basic Project Objective 3 reflects the aim to be prudent in the use of land within the existing transmission corridor and to allow adequate space within the ROW for future transmission expansion (Section A.2.3). Response to Comment F1-13 addresses SCE's argument to maximize the size of the project now in light of the opinion that at some future date, a need for additional transmission is likely to arise.

- F2-8 The comment asserts that the Draft EIR/EIS dismisses SCE's stated objectives and that the Phased Build Alternative would not fulfill SCE's purpose and need. The comment shows 11 bullet points regarding purpose and 5 bullet points regarding purpose and need, that all expand on the concepts originally presented by SCE to support the purpose of the Proposed Project (EIS Section A.2.1.1, SCE's Project Purpose and Need). The EIS analysis reflects SCE's PEA, which defined six project objectives (EIS Section A.2.1). General Response GR-2 (Agency-defined Basic Project Objectives) clarifies how SCE's original objectives were retained as agency-defined Basic Project Objectives. See also General Response GR-1 on the level of project need

- F2-9 The comment asserts that the Phased Build Alternative would trigger additional transmission system upgrades, including capacitor banks to provide reactive power support (in terms of MVAR). The comment identifies the implementation of a remedial action scheme (RAS) and additional reactive support features that would only be added to the corridor in response to excessive levels of generation, should the additional generation be developed.

Response to Comment F1-6 shows how these features were found to be needed in the ZGlobal analysis of Case #6, although the power flow modeling conclusion for Case #6 notes that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p. 12). See also General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative).

- F2-10 The comment reviews and lists the generation projects that have requested deliverability. The comment states that the Phased Build Alternative would limit the ability to provide deliverability. SCE also claims that the Proposed Project is a critical project and that the Phased Build Alternative would create an impediment in achieving RPS goals, including a higher 50 % RPS in Senate Bill 350 (2015). The comment restates the position that a high level of generation requires the Proposed Project. See General Responses GR-1 and GR-2 regarding need.

General Response GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) provides further information on the ability of the Phased Build Alternative to satisfy Basic Project Objective 2, regarding facilitating renewable energy, and General Response GR-3 discusses the use of RPS portfolios from the transmission planning process in evaluating project-level need. General Response GR-3 also includes a discussion of achieving California's future renewable energy goals in light of Senate Bill 350 (2015).

See also Response to Comment F1-9 and Response to Comment B9-3.

- F2-11 The comment describes higher power losses that are a function of conductor resistance and that would be greater with the Phased Build Alternative than with the Proposed Project. This topic is addressed in Responses to Comments B9-4 and B9-11.

- F2-12 The comment identifies potential implementation of a remedial action scheme (RAS) and additional reactive support that may be needed with the Phased Build Alternative, and the comment characterizes these elements as adding operational complexity.

The potential need for these operational elements and the resulting level of operational complexity, are addressed in Response to Comment F1-6, which notes how these features were found to be needed in the ZGlobal analysis of Case #6, although the power flow modeling conclusion for Case #6 notes that the Phased Build Alternative is not technically feasible in this scenario (EIS Appendix 5, Attachment 2, p. 12).

- F2-13 The comment indicates that the Phased Build Alternative would require an additional two years before SCE could put it into service, and that upstream development of generation projects could be delayed or postponed and some projects could fail. The EIS provides preliminary information regarding the scheduling of the alternative, for the limited purpose of assessing whether it would be eligible for consideration as an alternative to the Proposed Project. See also Response to Comment F1-20 for information on the potential for the alternative to result in a delay to SCE's anticipated in-service date.

## Comment Set F3: Southern California Edison Company, Appendix B

### Executive Summary

#### Page ES-2

##### DEIR/DEIS Text:

##### Description of the Proposed Project-Connected Actions

A number of solar generation projects appear to depend on the WOD Upgrade Project in order to move to construction and operation, because there currently is inadequate transmission capacity west of Devers Substation. The following generation projects are analyzed as actions connected to the WOD Project:

- Palen Solar Electric Generating System II, LLC (CAISO Queue 365) – 500 MW Solar Power Tower
- Desert Harvest, LLC (CAISO Queue 643AE) – 150 MW Solar Photovoltaic (PV)
- Project 1: Connecting to Blythe-Eagle Mountain 161 kV line (CAISO Queue 421) – 50 MW Solar PV
- Project 2: Connecting at Red Bluff Substation 230 kV (CAISO Queue 1070) – 250 MW Solar PV
- Project 3: Connecting at Colorado River Substation 230 kV (CAISO Queue 576) – 224 MW Solar PV
- Project 4: Connecting at Colorado River Substation 230 kV (CAISO Queue 970) – 150 MW Solar PV
- Project 5: Connecting at Colorado River Substation 230 kV (CAISO Queue 1071) – 150 MW Solar PV

##### SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's analysis of actions connected to the WOD Upgrade Project.

F3-1

#### Page ES-6

##### DEIR/DEIS Text:

##### CPUC and BLM Project Objectives

Having taken into consideration the six objectives set forth by SCE above, the CPUC and BLM identified three basic project objectives...

##### SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's identification of three basic project objectives for the WOD Upgrade Project as opposed to the six project objectives identified by SCE in the PEA for the Proposed Project.

F3-2

#### Page ES-6

##### DEIR/DEIS Text:

##### CPUC and BLM Project Objectives

Basic Project Objective 1: to upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW.

The first Basic Project Objective reflects the aim to provide increased deliverability of electricity, defined in terms of megawatts (MW), for existing and planned generating facilities that are located far from the utility load centers in the Los Angeles basin. Before the Proposed Project was planned, the transmission transfer capability of the WOD 220 kV corridor was limited to approximately 550 MW. Since then, several generators with plans to be online before the Proposed Project's estimated completion date in 2020 requested interconnection to the system. In order to accommodate and deliver the initial group of 5 solar power generation projects that was planned, totaling 2,200 MW (CAISO, 2010), the minimum total capability that would need to be achieved by the Proposed Project or any alternative is 2,750 MW. Accordingly, the first Basic Project Objective is to increase deliverability by at least 2,200 MW.

Basic Project Objective 2: to support achievement of State and federal renewable energy goals.

The second Basic Project Objective is directly related to the first, because the projects that plan to rely on the Proposed Project for delivering electricity to the Los Angeles basin are primarily solar generation projects. Therefore, an increase in the capacity of the WOD transmission lines would directly improve the ability for

F3-3



### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

numerous renewable generation projects to interconnect. Aside from the resources imported via transmission lines from outside of the SCE territory, all of the interconnecting projects are solar powered, as described in SCE's Application and PEA Sections 1.1 and 1.2.

California's renewable energy goals are defined on the CPUC's website (CPUC, 2015): Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107 and expanded in 2011 under Senate Bill 2, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires investor-owned utilities (IOUs), electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33% of total procurement by 2020.

The CPUC states that California's three large utilities collectively served 22.7% of their 2013 retail electricity sales with renewable power. The federal government also has prioritized the development of renewable energy, but has not set specific development targets for the country as a whole.

#### SCE Comment:

Please see SCE's accompanying cover letter and Attachment A regarding SCE's concerns about Basic Project Objective 2.

F3-3  
cont.

### Pages ES-10 through ES-11

#### DEIR/DEIS Text:

##### CEQA and NEPA Requirements for Alternatives

Under CEQA, alternatives to the Proposed Project are identified and evaluated in accordance with CEQA Guidelines. CEQA Guidelines (Section 15126(a)) state:

An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.

#### SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting the conclusion that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project.

F3-4

### Page ES-15

#### DEIR/DEIS Text:

##### Phased Build Alternative

Under the heading phased build alternative,

The high-performance conductors would maximize power transfer and avoid structurally overloading the existing towers. In this alternative, the existing 66 kV sub-transmission system would not be affected and the replacement 66 kV line that would move to Iowa Street under the Proposed Project would not be required.

#### SCE Comment:

Based on preliminary review of the Phased Build Alternative, SCE cannot confirm the 66 kV line would not be affected as there is not sufficient space to safely string conductor without a shoo-fly or multiple line outages. Please see SCE's accompanying cover letter for additional information related to these construction constraints.

F3-5

### Page ES-16

#### DEIR/DEIS Text:

##### Phased Build Alternative

Footnote 3: The Phased Build Alternative would have capacity for all the generation included in the CAISO 2024 Reliability Base Case (see EIR/EIS Appendix S (Alternatives Screening Report), Attachment 2, pages S-6 and Table A4). This scenario includes 3,754 MW of Total Generation Online and 6,901 MW of Total Generation Capacity, as

F3-6



### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

well as the power flow on the system resulting from import of 1,400 MW from the Imperial Irrigation District into the Los Angeles Basin.

#### SCE Comment:

Please see SCE's accompanying cover letter and Attachment A for reasons as to why the CAISO 2024 Reliability Base Case should not be used in considering alternatives to the Proposed Project.

F3-6  
cont.

#### Page ES-16

#### DEIR/DEIS Text:

##### Phased Build Alternative- Description

**Retain existing double-circuit towers.** The existing double-circuit towers would be retained. Prior to reconductoring approximately 20% of the existing structures would be strengthened and their heights increased.

#### SCE Comment:

Appendix 5, attachment 3 confirms SCE's original response in Data Request 10 stating that the single conductor Drake 795 ACCR conductor would require a 30% increase in strength or height for the structures. Further, structure height increases would require SCE to evaluate the means and methods for performing the work. For example, existing tower foundations may not support the increase in structure height, thus, requiring new foundations and possibly new towers to be constructed for this alternative.

Please make the following revision to the DEIR language:

Prior to reconductoring, approximately

~~20% 30%~~ of the existing structures would likely be replaced to provide increased strengthened and/or their heights-increased.

F3-7

#### Page ES-16

#### DEIR/DEIS Text:

##### Phased Build Alternative- Description

**Allow for future capacity expansion within the existing corridor with several optional future phases.** These phases would be implemented as generation projects become certain and capacity is clearly required. Because the Phased Build Alternative would accommodate projects now defined in the CAISO's 2024 Reliability Base Case, it may be 10 years before additional upgrades are needed. The future phases could include:

- Reconductoring the newly constructed 220 kV structures with higher capacity conductors;
- Replacing the retained 220 kV structures with new, stronger 220 kV structures in order to carry heavier, higher capacity conductors;
- Install a single- or double-circuit 500 kV or 220 kV line in the vacant space remaining in the ROW.

#### SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's characterization of optional future phases to the WOD Upgrade Project.

F3-8

#### Page ES-16

#### DEIR/DEIS Text:

##### Phased Build Alternative- Description

**Install high-capacity conductors on all four circuits.** Both the new and existing 220 kV double-circuit towers would have the "795 Drake" Aluminum Conductor Composite Reinforced (ACCR) installed.

#### SCE Comment:

This bullet point referencing installation of the high capacity conductor in the executive summary conflicts with the description for conductor installation as seen in Appendix 5, specifically in Segment 1 (Etiwanda-San Bernardino and San Bernardino-Vista). For clarity, please make the following revision:

F3-9

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Install high-capacity conductors on all four circuits. Both the new and existing 220 kV double-circuit towers would have the "795 Drake" Aluminum Conductor Composite Reinforced (ACCR) installed with the exception of Segment 1, where only two of the existing four circuits would use the high capacity conductor.

F3-9  
cont.

#### Page ES-16

##### DEIR/DEIS Text:

Rationale for Full Analysis. The Phased Build Alternative is retained for analysis because it would reduce the environmental impacts of the Proposed Project by greatly reducing the amount of construction disturbance in comparison with the Proposed Project.

##### SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting the conclusion that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project.

F3-10

#### Page ES-67

##### DEIR/DEIS Text:

Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference.

##### SCE Comment:

Because electrical interference is based on system voltage as opposed to power flow, the alternative would not have a difference in potential impacts as compared to the Proposed Project.

Please delete the following from the DEIR:

~~Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference.~~

F3-11

#### Page ES-71

##### DEIR/DEIS Text:

Under heading ES.6.2 Environmentally Superior/Preferred Alternative, and the Phased Build Alternative,

The Phased Build Alternative is preferred over the Proposed Project because it would reduce construction impacts by eliminating the need to remove and reconstruct the existing 220 kV structures and relocate the existing 66 kV subtransmission lines.

##### SCE Comment:

The sentence implies that all of the 220 kV structures would not need to be removed and reconstructed, when in fact, the Phased Build Alternative calls for the removal and reconstruction of the single-circuit structures. As such, the following revision is suggested:

The Phased Build Alternative is preferred over the Proposed Project because it would reduce construction impacts by eliminating the need to remove and reconstruct the double circuit existing 220 kV structures and relocate the existing 66 kV subtransmission lines.

F3-12

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page ES-71**

**DEIR/DEIS Text:**

The Phased Build Alternative would not require implementation of the Iowa Street 66 kV Underground Alternative, since the existing 66 kV system would not be affected.

**SCE Comment:**

Based on SCE's preliminary review of the Phased Build Alternative, SCE cannot confirm the 66 kV line would not be affected as there is not sufficient space for safely stringing conductor without a shoo-fly or multiple line outages. Please see SCE's accompanying cover letter for additional information related to construction constraints.

**F3-13**

### Responses to Comment Set F3 – Executive Summary

- F3-1 See Response to Comment F1-4 regarding connected actions.
- F3-2 Please see General Response GR-2 (Agency-defined Basic Project Objectives) and Responses to Comment F1-7 through F1-9.
- F3-3 Please see General Responses GR-2 (Agency-defined Basic Project Objectives) and GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) and Responses to Comment F1-7 through F1-9.
- F3-4 Please see General Response GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) and Responses to Comment F1-7 through F1-9. The description of the impacts of the Phased Build Alternative is presented in Section D for each discipline, and summarized in Section G, Comparison of Alternatives.
- F3-5 SCE notes that the relocation of the 66 kV transmission line in Segment 1 may not be eliminated by the Phased Build Alternative. Please see Responses to Comment F1-18.
- F3-6 Please see General Response GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) and Response to Comment F1-8. In addition, please see Response to Comment F1-8 regarding the use of the CAISO 2024 Reliability Base Case.
- F3-7 The comment requests a clarification in the description of the Phased Build Alternative that is now included in the EIS as: “up to 30% of the existing structures would need to be replaced or modified to provide increased strengthened and/or their heights-increased”. This text change has been made in the Executive Summary (Section ES.3.2), Section C (Section C.4.3), and Appendix 5 (Alternatives Screening Report, Section 4.4).
- F3-8 See General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative).
- F3-9 The comment suggests clarifying that new high-capacity conductors would be included on all four circuits, except in Segment 1, where only two of the existing four circuits would use the high capacity conductor. The text has been changed to reflect this clarification.
- F3-10 See Response to Comment F3-4.
- F3-11 The commenter requests deletion of the statement that under the Phased Build Alternative a reduced amount of power flow would lead to a reduced potential for electrical interference. Section ES.4.21.2 (Effects of Alternatives on Electrical Interference and Safety) in the Executive Summary of the Final EIS has been revised to remove the sentence. In addition, a similar statement has been removed in Section D.21.4.3 (Phased Build Alternative) in Response to Comment F3-531.
- F3-12 The suggested clarification as to which 220 kV structures would be removed has been made in the Final EIS.
- F3-13 Please see Response to Comment F3-5.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section A Introduction

#### Page A-3

**DEIR/DEIS Text:**

Footnote 1 - Pursuant to 25 U.S.C. §323.

**SCE Comment:**

Pursuant to 25 U.S.C. §323 81.

F3-14

#### Page A-5

**DEIR/DEIS Text:**

**A.2.1.3 Review of SCE's Purpose and Need**

As a result, SCE proposes to remove all existing 220 kV structures and replace them with larger capacity 220 kV structures.

**SCE Comment:**

As described in the Proposed Project, SCE proposes the reuse of some of the existing double-circuit 220 kV structures and as such recommends the following edit:

As a result, SCE proposes to remove all a majority of the existing 220 kV structures and replace them with larger capacity 220 kV structures.

F3-15

#### Page A-11

**DEIR/DEIS Text:**

**CPUC and BLM Project Objectives**

Having taken into consideration the objectives and purpose and need set forth by SCE (Sections A.2.1.1 and A.2.1.2), the CPUC and BLM identified 3 basic project objectives. These objectives are used by the CPUC and BLM to evaluate alternatives and to define a range of reasonable alternatives to the Proposed Project. The evaluation of alternatives in this EIR/EIS provides information on whether each alternative could feasibly accomplish most or all of these basic objectives.

**SCE Comment:**

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's identification of three basic project objectives for the WOD Upgrade Project as opposed to the six project objectives identified by SCE in the PEA for the Proposed Project.

F3-16

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page A-11

#### DEIR/DEIS Text:

##### A.2.3 CPUC and BLM Project Objectives

Basic Project Objective 1: To upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW.

The first Basic Project Objective reflects the aim to provide increased deliverability of electricity, defined in terms of MW, for existing and planned generating facilities that are located far from the utility load centers in the Los Angeles basin. Before the Proposed Project was planned, the transmission transfer capability of the WOD 220 kV corridor was limited to approximately 550 MW. Since then, several generators with plans to be online before the Proposed Project's estimated completion date in 2020 requested interconnection to the system. In order to accommodate and deliver the initial group of 5 solar power generation projects that was planned, totaling 2,200 MW (CAISO, 2010), the minimum total capability that would need to be achieved by the Proposed Project or an alternative is 2,750 MW. Accordingly, the first Basic Project Objective is to increase deliverability by at least 2,200 MW. The initial 5 projects are described in Section A.2.1.4.1 above, Table A-3, and in 2010 they were the following: —NextEra Desert Center Blythe, LLC (Genesis McCoy): 500 MW —NextEra Blythe Solar Energy Center, LLC: 1,000 MW —Palen SEG5 II, LLC (Palen) subsidiary of BrightSource Energy: 500 MW —Project interconnecting at Blythe–Eagle Mountain 161 kV line: 50 MW —Project interconnecting at Colorado River 220 kV: 150 MW The EIR/EIS team completed independent power flow modeling to evaluate the capacity of the current transmission system, the Proposed Project, and several sensitivities. The report of these studies is presented as Attachment 2 to EIR/EIS Appendix S (Alternatives Screening Report). The CAISO's 2024 Reliability Base Case, from the CAISO's 2013/2014 transmission planning process (one of the base cases used in the alternative analysis) represents the view from the CAISO's and SCE's perspective (a collaborative effort) of the level of generation deemed viable (based on a number of criteria) and to be in place and operational in 2024. The generation level from all renewable and conventional resources within the Eastern Bulk system for the region under analysis is: —Total Generation On-line: 3,754 MW —Total Generation Capacity: 6,901 MW The power flow modeling for the WOD Upgrade Project, and potential alternatives that would need to meet this objective, uses the 2024 Reliability Base Case

#### SCE Comment:

Please see SCE's accompanying cover letter and Attachment A for a detailed description of SCE's argument that Basic Project Objective 1 does not sufficiently meet the need for the WOD Upgrade Project and the CAISO 2024 Reliability Base Case should not be used in considering alternatives to the Proposed Project.

F3-17

### Page A-12

#### DEIR/DEIS Text:

Basic Project Objective 2: to support achievement of State and federal renewable energy goals.

The second Basic Project Objective is directly related to the first, because the projects that plan to rely on the Proposed Project for delivering electricity to the Los Angeles basin are primarily solar generation projects. Therefore, an increase in the capacity of the WOD transmission lines would directly improve the ability for numerous renewable generation projects to interconnect. Aside from the resources imported via transmission lines from outside of the SCE territory, all of the interconnecting projects are solar powered, as described in SCE's Application and PEA Sections 1.1 and 1.2. See also Section A.2.1.4.1 (above).

#### SCE Comment:

Please see SCE's accompanying cover letter and Attachment A for SCE's concerns about Basic Project Objective 2.

F3-18

### Page A-13

#### DEIR/DEIS Text:

##### A.3 Definition of Connected Actions and Related Projects

Table A-6. Project Analysis Determinations

#### SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's analysis of actions connected to the WOD Upgrade Project.

F3-19

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page A-16

DEIR/DEIS Text:

SCE would apply to BIA for the grant of ROW across the new 3-mile alignment across the Morongo tribal land and for the replacement and upgrade aspects of the transmission line.

SCE Comment:

The BIA will not be approving SCE's construction in the tribal trust lands. Instead, BIA will consider that construction as a reasonably foreseeable impact in determining whether or not to approve the ROW grant. Please make the following revisions: SCE would apply to BIA for the grant of ROW across the new 3-mile alignment across the Morongo tribal land. ~~and for the replacement and upgrade aspects of the transmission line.~~

F3-20

Page A-16

DEIR/DEIS Text:

No local discretionary (e.g., use) permits are required, since the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of SCE facilities in California. SCE would still have to obtain all ministerial building and encroachment permits from local jurisdictions, and the CPUC's General Order 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions. The CPUC's authority does not preempt special districts, such as the South Coast Air Quality Management District, or other State agencies or the federal government.

SCE Comment:

The CPUC's General Order 131-D does not state that SCE must comply with local building, design and safety standards as indicated in the DEIR/DEIS. General Order 131-D, Section XIV, Part B explains that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to the Commission's Jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters. For accuracy, please make the following revision.

No local discretionary (e.g., use) permits are required, since the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of SCE facilities in California. However, the CPUC's General Order 131-D requires SCE to consult with local agencies in locating its project. SCE would still have to obtain all ministerial building and encroachment permits from local jurisdictions, and the CPUC's General Order 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions. The CPUC's authority does not preempt special districts, such as the South Coast Air Quality Management District, or other State agencies or the federal government.

F3-21

Page A-17

DEIR/DEIS Text:

Table A-7 Permits that may be Required for the West of Devers Upgrade Project

SCE Comment:

Please add to the table the following under the Tribal Lands header.

Agency	Jurisdiction	Requirements
U.S. Environmental Protection Agency	Tribal Lands	Clean Water Act Section 402, General Permit for Storm Water Discharges Associated with Construction Activities On Tribal Land

F3-22

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page A-17**

**DEIR/DEIS Text:**

Table A-7 Permits that may be Required for the West of Devers Upgrade Project

**SCE Comment:**

In addition to FAA 7460-1, SCE will also apply for FAA 7460-2 Notice of Actual Construction or Alteration which is required 5 days after reaching the maximum height. Please include the 7460-2 in the requirements section added below:

Agency	Jurisdiction	Requirements
Federal Aviation Administration (FAA)	Air safety near San Bernardino International Airport and Banning Municipal Airport	<ul style="list-style-type: none"> <li>Form 7460-1, Notice of Proposed Construction or Alteration; Permit and Notice to Airmen</li> <li><u>Form 7460-2, Notice of Actual Construction or Alteration</u></li> </ul>

F3-23

**Page A-17**

**DEIR/DEIS Text:**

Table A-7 Permits that may be Required for the West of Devers Upgrade Project

**SCE Comment:**

Please remove the reference to Section 401 and update the description of the 404 permit.

Agency	Jurisdiction	Requirements
U.S. Army Corps of Engineers (USACE), Los Angeles District	Construction or operation of facilities which may result in any discharge into U.S. navigable waters	<ul style="list-style-type: none"> <li>Section 404/404 Permit – streambed alteration-crossing <u>discharge of fill material into jurisdictional waters</u></li> </ul>

F3-24

**Page A-17**

**DEIR/DEIS Text:**

Under State or Regional Agencies:

Regional Water Quality Control Board (RWQCB) – Colorado River Office (Region 7) and Santa Ana Office (Region 8)”

**SCE Comment:**

Please remove the “Clean Water Act 401 certification” from the RWQCB section and add it under a new Section for State Water Resources Control Board (SWRCB).

State or Regional Agencies		
Regional Water Quality Control Board (RWQCB) – Colorado River Office (Region 7) and Santa Ana Office (Region 8)	Protection of surface waters under the Clean Water Act	<ul style="list-style-type: none"> <li><del>Clean Water Act Section 401 certification</del></li> <li>Clean Water Act Section 402, General Permit for Storm Water Discharges Associated with Construction Activities</li> </ul>
State Water Resources Control Board (SWRCB)	<u>Protection of surface waters under the Clean Water Act</u>	<ul style="list-style-type: none"> <li><u>Clean Water Act Section 401 certification</u></li> </ul>

F3-25



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page A-17

DEIR/DEIS Text:

South Coast Air Basin and Coachella Valley

SCE Comment:

Please see addition to South Coast Air Basin and Coachella Valley added in "and portion of the Salton Sea Air Basin".

F3-26

State or Regional Agencies		
South Coast Air Quality Management District (SCAQMD)	South Coast Air Basin and Coachella Valley and <u>portion of the Salton Sea Air Basin</u>	<ul style="list-style-type: none"><li>Fugitive Dust Control Plan</li></ul>

### Responses to Comment Set F3 – Section A Introduction

- F3-14 As suggested by the commenter, footnote 1 in Section A.1.3 (Morongo Tribal Land History and Background) has been revised to say “Pursuant to 25 U.S.C. § 81.”
- F3-15 As suggested by the commenter, the text in Section A.2.1.3 (Review of SCE’s Purpose and Need) has been revised to more accurately reflect the description of the Proposed Project. The Final EIS states that SCE proposes to remove “a majority of the existing 220 kV structures” instead of “all” structures, as was written in the Draft EIR/EIS.
- F3-16 Please see General Responses GR-2 (Basic Project Objectives), GR-3 (Renewable Energy Accommodated by the Phased Build Alternative), and GR-4 (Potential Future Construction under the Phased Build Alternative)
- F3-17 Please see Responses to Comments on SCE’s Attachment A (Comment Set F2).
- F3-18 Please see General Response GR-2 (Basic Project Objectives).
- F3-19 Please see Response to Comment F1-4 regarding the commenter’s concerns about the Draft EIR/EIS’s analysis of connected actions.
- F3-20 The commenter states that the Bureau of Indian Affairs (BIA) will not be approving SCE’s construction on the tribal trust lands. Instead, BIA will consider construction as a reasonably foreseeable impact in determining whether or not to approve the ROW grant.
- As a result, Section A.4.3 (Other Agencies) of the Final EIS has been revised and now states that SCE would apply to BIA for the grant of ROW across the new 3-mile alignment across the Morongo tribal land. As suggested, the text regarding BIA’s approval of the replacement and upgrade aspects of the transmission line has been deleted.
- F3-21 The commenter states that the CPUC’s General Order 131-D does not state that SCE must comply with local building, design and safety standards as indicated in the Draft EIR/EIS. General Order 131-D applies to the CPUC and not BLM. However, the text in Section A.4.3 (Other Agencies) has been revised in the Final EIS to directly quote the language used in General Order 131-D, Section XIV, Part B.
- F3-22 The commenter requests that an additional permit be added to Table A-7 (Permits that May Be Required for the West of Devers Upgrade Project) in Section A.4.4 (Permits Required for the Proposed Project). Table A-7 has been revised in the Final EIS to make this requested update.
- F3-23 The commenter requests that Form 7460-2 be added to Table A-7 (Permits that May Be Required for the West of Devers Upgrade Project) in Section A.4.4 (Permits Required for the Proposed Project) for the FAA as SCE will be providing two notices to the FAA. Table A-7 has been revised in the Final EIS to make this requested update.
- F3-24 The commenter requests that Table A-7 be updated such that reference to the Section 401 permit be removed from the U.S. Army Corp of Engineers and that the reference to the Section 404 permit be retained but revised to include a description of the Section 404 requirements which states “discharge of fill material into jurisdictional waters.” Table A-7 has been revised in the Final EIS to make these requested changes.
- F3-25 The commenter requests that Table A-7 be updated such that the Clean Water Act Section 401 certification permit be removed from the Regional Water Quality Control Board and

added under a new row to the State Water Resources Control Board. Table A-7 has been revised in the Final EIS to make these requested changes.

F3-26

The commenter requests that Table A-7 be updated to include a portion of the Salton Sea Air Basin in the description of the jurisdiction of the South Coast Air Quality Management District. The South Coast AQMD does include a portion of the Salton Sea Air Basin, so Table A-7 has been revised in the Final EIS to make this requested update.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section B Description of the Proposed Project

#### Page [none]

DEIR/DEIS Text:

—

#### SCE Comment:

As explained to the CPUC/BLM, SCE proceeded with additional engineering for the Proposed Project during the agencies preparation of the DEIR/DEIS in order to meet the in-service date for the West of Devers Upgrade Project. The modifications to the Proposed Project description as a result of this additional engineering analysis would generally reduce impacts described in the DEIR/DEIS.

F3-27

#### Page B-1

DEIR/DEIS Text:

Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV subtransmission line relocations;

#### SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations:

~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

F3-28

#### Page B-1

DEIR/DEIS Text:

The existing WOD corridor traverses a combination of residential, commercial, agricultural, recreation, and open space land uses. The existing structures and existing conductor would be removed and replaced within the existing ROW, except for an approximately 3-mile portion of Segment 5 on the Morongo Band of Mission Indians (Morongo) Reservation that would be in new ROW.

#### SCE Comment:

SCE suggests including the word "primarily" as indicated below in order to be consistent with verbiage elsewhere in the DEIR/DEIS:

The existing WOD corridor traverses a combination of residential, commercial, agricultural, recreation, and open space land uses. The existing structures and existing conductor would be removed and replaced primarily within the existing ROW, except for an approximately 3-mile portion of Segment 5 on the Morongo Band of Mission Indians (Morongo) Reservation that would be in new ROW.

F3-29

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page B-1**

**DEIR/DEIS Text:**

Originally, the upgrades west of Devers Substation were planned as part of the Devers-Palo Verde No.2 Project (DPV2). Proposed by SCE in 2005, DPV2 involved construction of a new 230-mile 500 kV line from the Harquahala Substation in Arizona to the Devers Substation in North Palm Springs, California, as well as upgrading an additional 50 miles of 220 kV transmission lines west of Devers Substation. The original WOD proposed upgrades included replacing two existing single-circuit 220 kV lines with a new double-circuit 220 kV line and reconductoring a third 220 kV line between Devers Substation and San Bernardino Junction; reconductoring of 4.8 miles of 220 kV transmission line between San Bernardino Junction and Vista Substation; and reconductoring of 3.4 miles of 220 kV transmission line between San Bernardino Junction and San Bernardino Substation located in San Bernardino County, California.

**SCE Comment:**

SCE recommends the following explanation clarifying the original need for the West of Devers Upgrade Project that was considered in 2005 as compared to the need for today's Proposed Project, which should be included in this section. Please revise to add the following:

The reason for the scope difference between the original WOD project as part of the Devers – Palo Verde No.2 and the current Proposed WOD upgrade is that the original WOD project scope was limited to 1200MW flow increase associated with the Devers – Palo Verde No.2 project, while the scope of the Proposed Project is to maximize the transfer capability on the WOD corridor to accommodate the renewable resources development in Riverside East.

**Page B-1**

**DEIR/DEIS Text:**

Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV subtransmission line relocations;

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations

~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

**Page B-1**

**DEIR/DEIS Text:**

Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV subtransmission line relocations;

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

F3-30

F3-31

F3-32

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page B-2

##### DEIR/DEIS Text:

FN1 - However, the replacement and upgrade project is subject to BIA approval.

F3-33

##### SCE Comment:

The BIA will not be approving SCE's construction in the tribal trust lands. Instead, BIA will consider that construction as a reasonably foreseeable impact in determining whether or not to approve the ROW grant. Please remove the following footnote:

~~However, the replacement and upgrade project is subject to BIA approval.~~

#### Page B-2

##### DEIR/DEIS Text:

Under the heading of "The main differences...", the 1st bullet states:

Replacement Structures Due to Heavier Conductor: SCE's proposes to use heavier (higher capacity) conductors. The existing 220 kV structures would not support the greater weight and SCE is proposing to remove and replace all structures in the corridors.

F3-34

##### SCE Comment:

For clarification please change the word "heavier" to "SCE's standard":

Replacement Structures Due to Heavier Conductor: SCE proposes to use heavier SCE's standard (higher capacity) conductors. The existing 220 kV structures would not support the greater weight and SCE is proposing to remove and replace all structures in the corridors.

#### Page B-4

##### DEIR/DEIS Text:

Under the heading Segment 1: San Bernardino (MP SB0 to MP SB3.5), the last sentence on the second paragraph states :

Transmission line work within Segment 1 would include removal of approximately 45 220 kV LSTs, installation of approximately 49 220 kV structures, and modifications to 1 existing LST within the existing ROW.

F3-35

##### SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Transmission line work within Segment 1 would include removal of approximately 45 220 kV LSTs, installation of approximately ~~49~~ 46 220 kV structures, and modifications to 1 existing LST within the existing ROW.

#### Page B-4

##### DEIR/DEIS Text:

Under the heading Segment 2: Colton, Grand Terrace and Loma Linda (MP 0 to MP 5.2) the last sentence on the second paragraph states :

Transmission work within Section 2 would include removal of approximately 25 double-circuit LSTs, installation of approximately 28 structures, and modifications to 4 existing structures.

F3-36

##### SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Transmission work within Section 2 would include removal of approximately ~~25~~ 23 double-circuit LSTs, installation of approximately ~~28~~ 25 structures, and modifications to ~~4~~ 6 existing structures.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page B-5**

**DEIR/DEIS Text:**

Under the heading Segment 3: San Timoteo Canyon (MP 5.2 to MP 15.2) the last sentence on the second paragraph states:

Project work within Segment 3 would include removal of approximately 118 LSTs, installation of approximately 104 structures, and modifications to 4 existing structures.

**SCE Comment:**

As a result of additional engineering analysis, the following changes have been identified:

Project work within Segment 3 would include removal of approximately 118 LSTs, installation of approximately ~~104~~ 102 structures, and modifications to 4 existing structures.

**F3-37**

**Page B-5**

**DEIR/DEIS Text:**

Under the heading Segment 4: Beaumont and Banning (MP 15.2 to MP 27.4) the last sentence on page B-5 states:

Project work within Segment 4 would include removal of 161

**SCE Comment:**

As a result of additional engineering analysis, the following changes have been identified:

Project work within Segment 4 would include removal of ~~161~~ 160

**F3-38**

**Page B-6**

**DEIR/DEIS Text:**

Under the heading Segment 4: Beaumont and Banning (MP 15.2 to MP 27.4) the first sentence on page B-6 states:

structures, installation of approximately 112 structures, and modifications to 5 existing structures.

**SCE Comment:**

As a result of additional engineering analysis, the following changes have been identified:

structures, installation of approximately ~~112~~ 111 structures, and modifications to ~~5~~ 6 existing structures.

**F3-39**

**Page B-6**

**DEIR/DEIS Text:**

Under the heading Segment 6: Whitewater and Devers (MP 36.9 to MP 45) the last sentence on the second paragraph states:

Project work within Segment 6 includes removal of 112 structures, installation of 79 structures, and modifications to 5 existing structures.

**SCE Comment:**

As a result of additional engineering analysis, the following changes have been identified:

Project work within Segment 6 includes removal of ~~112~~ 117 structures, and installation of ~~79~~ 85 structures, and ~~modifications to 5 existing structures.~~

**F3-40**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-7

DEIR/DEIS Text:

Table B-1. Typical Transmission Structure Dimensions

Type of Structure	Proposed Number of Structures	Approximate Height Above Ground	Approximate Pole Diameter	Approximate Auger Hole Depth	Approximate Auger Diameter
LST	394	110–189 feet	N/A	15–30 feet	3.0–7.0 feet at each leg
TSP	76	110–200 feet	3.0–7.0 feet	30–60 feet	5–12 feet

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Please see attached file “WODUP Tables B-1 and B-2 Rev.xlsx and updated Table B-1 below:

Table B-1. Typical Transmission Structure Dimensions

Type of Structure	Proposed Number of Structures	Approximate Height Above Ground	Approximate Pole Diameter	Approximate Auger Hole Depth	Approximate Auger Diameter
LST	<u>394</u> <del>384</del>	<u>110–193</u> <del>110–189</del> feet	N/A	15–30 feet	3.0–7.0 feet at each leg
TSP	<u>76</u> <del>83</del>	<u>110–198</u> <del>110–200</del> feet	<u>3.0–10.0</u> <del>3.0–7.0</del> feet	30–60 feet	<u>5–14</u> <del>5–12</del> feet

Page B-7

DEIR/DEIS Text:

Under Table B-1. Typical Transmission Structure Dimensions states: Source: SCE, 2013.

SCE Comment:

Please see revised text: Source: SCE, 2013 2015.

Page B-7

DEIR/DEIS Text:

Footnote 1 under Table B-1. Typical Transmission Structure Dimensions states:

1 - Includes 38 TSPs in Segment 5 per agreement between SCE and Morongo.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

1 - Includes ~~38-34~~ TSPs in Segment 5 per agreement between SCE and Morongo.

Page B-7

DEIR/DEIS Text:

The second sentence on the first paragraph under Table B-1. Typical Transmission Structure Dimensions states:

As part of the entire Proposed Project, approximately 5 TSPs, 153 H-frame structures, 408 LSTs, 29 three-pole structures, and approximately 562 miles of conductor would be removed, as shown in Table B-2.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

As part of the entire Proposed Project, approximately 5 TSPs, 153 H-frame structures, ~~408~~ 413 LSTs, 29 three-pole structures, and approximately 562 miles of conductor would be removed, as shown in Table B-2.

F3-41

F3-42

F3-43

F3-44



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-7

DEIR/DEIS Text:

Table B-2. Transmission 220 kV Removal and Installation Per Segment

Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
<b>Proposed Project Removals</b>						
Double-circuit lattice steel tower	44	25	33	37	33	28
Single-circuit lattice steel tower	1	0	85	61	34	30
H-frame	0	0	0	53	55	45
Three-pole structure	0	0	0	10	10	9
Single-circuit TSP	0	0	0	0	5	0
Conductor (miles)	59	31	12	14	108	96
OHGW (miles)	7	5	50	63	45	40
<b>Proposed Project Installation</b>						
Double-circuit lattice steel tower	46	19	94	98	60	77
Double-circuit tubular steel pole	1	7	10	14	38	2
Single-circuit tubular steel pole	2	2	0	0	0	0
Circuit length (miles)	14	10	40	48	36	32
Conductor (miles)	87	67	26	32	250	211
OPGW (miles)	7	6	22	26	20	18
<b>Proposed Project Existing Structures To Be Modified</b>						
Double-circuit lattice steel tower	1	4	4	5	0	5

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified. Please see attached file "WODUP Tables B-1 and B-2 Rev.xlsx and updated Table B-1.

Page B-7

DEIR/DEIS Text:

Under Table B-2. Transmission 220 kV Removal and Installation Per Segment states: Source: SCE, 2013.

SCE Comment:

Please see revised text. Source: SCE, 2013 2015.

F3-45

F3-46

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page B-8**

**DEIR/DEIS Text:**

Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee substations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.

**F3-47**

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee substations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.~~

**Page B-8**

**DEIR/DEIS Text:**

Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee substations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.

**F3-48**

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee substations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.~~

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page B-10

#### DEIR/DEIS Text:

##### B.2.2.6 Timoteo Substation

Timoteo Substation is an existing 66/12 kV substation located near the intersection of Redlands Boulevard and Mountain View Avenue in the City of Loma Linda, as shown on Figure B-11g. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.

The 66 kV switchrack has six positions. The following work would be carried out at two positions:

- Replacement of two oil-type 66 kV CBs with new SF6 gas-type CBs;
- Installation of 12 surge arresters; and
- Replacement of existing equipment foundations to accommodate new equipment and reconnect to existing conduit and grounding.

#### SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

##### B.2.2.6—Timoteo Substation

~~Timoteo Substation is an existing 66/12 kV substation located near the intersection of Redlands Boulevard and Mountain View Avenue in the City of Loma Linda, as shown on Figure B-11g. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.~~

~~The 66 kV switchrack has six positions. The following work would be carried out at two positions:~~

- ~~– Replacement of two oil-type 66 kV CBs with new SF6 gas-type CBs;~~
- ~~– Installation of 12 surge arresters; and~~
- ~~– Replacement of existing equipment foundations to accommodate new equipment and reconnect to existing conduit and grounding.~~

### Page B-10

#### DEIR/DEIS Text:

##### B.2.2.7 Tennessee Substation

Tennessee Substation is an existing 66/12 kV substation located at Avenue E and 18th Street in the City of Yucaipa, as shown on Figure B-11h. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.

The 66 kV switchrack has six positions. The following work would be conducted at one position:

- Replacement of one oil-type 66 kV CB with a new SF6 gas-type CB;
- Installation of six surge arresters; and
- Replacement of existing equipment foundations to accommodate new equipment conduit and grounding.

#### SCE Comment:

Please remove the following references to the Tennessee Substation.

##### B.2.2.7—Tennessee Substation

~~Tennessee Substation is an existing 66/12 kV substation located at Avenue E and 18th Street in the City of Yucaipa, as shown on Figure B-11h. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.~~

~~The 66 kV switchrack has six positions. The following work would be conducted at one position:~~

- ~~– Replacement of one oil-type 66 kV CB with a new SF6 gas-type CB;~~
- ~~– Installation of six surge arresters; and~~
- ~~– Replacement of existing equipment foundations to accommodate new equipment conduit and grounding.~~

F3-49

F3-50

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B.11

DEIR/DEIS Text:

**B.2.2.8 Substation Lighting**

Approximately 10 new and 30 replacement lights would be installed on the switchracks for upgraded line positions at Devers, El Casco, Vista, San Bernardino, Timoteo, and Tennessee Substations.

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

**B.2.2.8 Substation Lighting**

Approximately 10 new and 30 replacement lights would be installed on the switchracks for upgraded line positions at Devers, El Casco, Vista, ~~and San Bernardino, Timoteo, and Tennessee~~ Substations.

F3-51

Page B-15

DEIR/DEIS Text:

Dental 12 kV Distribution Circuit relocation would be approximately 1.0 mile in length and would reconnect in a new underground system, which would originate on the north side of mission Road and east of Mountain View Avenue and extend southeasterly for approximately 1.0 mile to California Street. The 12 kV underground system would then extend south along California Street for approximately 500 feet to Barton Road. At this location, the 12 kV circuit would transition from underground to overhead via a distribution riser pole and reconnect to the existing Dental 12 kV circuit.

**SCE Comment:**

As a result of additional engineering analysis, the following changes have been identified:

Dental 12 kV Distribution Circuit relocation would be approximately 1.0 mile in length and would reconnect in a new underground system, which would originate on the north side of mission Road and east of Mountain View Avenue and extend southeasterly for approximately 1.0 mile to California Street. The 12 kV underground system would then extend south along California Street for approximately 500 feet to Barton Road. At this location, the 12 kV circuit would transition from underground to overhead via a distribution riser pole and reconnect to the existing Dental 12 kV circuit. Included on the Dental is a reconductor of approximately 0.3mi of 3W 1/OACSR and a new overhead three phase bank for the removal of an existing overhead three phase bank in the transmission corridor. This reconductor may require approximately four distribution pole replacements.

F3-52

Page B-15

DEIR/DEIS Text:

Intern 12 kV Distribution Circuit relocation would be approximately 2.0 miles in length and would be relocated in the same new underground system described for the Dental 12 kV circuit. The Intern 12 kV circuit would transition from underground to overhead via a distribution riser pole at Barton Road, then continue west from California Street for 0.5 miles to Mayberry Street as underbuild (installing distribution circuit facilities under the 66 kV subtransmission circuit on the same structure) on an existing subtransmission pole. The new underbuild may require approximately 11 subtransmission structures be replaced.

**SCE Comment:**

As a result of additional engineering analysis, the following changes have been identified:

Intern 12 kV Distribution Circuit relocation would be approximately 2.0 miles in length and would be relocated in the same new underground system described for the Dental 12 kV circuit. The Intern 12 kV circuit would transition from underground to overhead via a distribution riser pole at Barton Road, then continue west from California Street for 0.5 miles to Mayberry Street as underbuild (installing distribution circuit facilities under the 66 kV subtransmission circuit on the same structure) on an existing subtransmission pole. The new underbuild may require approximately ~~11~~ one subtransmission structures be replaced ~~and one new subtransmission structure.~~

F3-53

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages B-15 through 16

DEIR/DEIS Text:

2. Connect the existing Devers-Valley OPGW to the MEER in Banning Substation.

Install approximately 690 feet of fiber optic cable in a new underground conduit between the existing Devers-Valley No. 2 500 kV structure M21-T3 to an existing distribution pole on Coyote Trail approximately 3,200 feet west of Old Idyllwild Road. From this existing distribution pole on Coyote Trail, install approximately 4,100 feet of new fiber optic cable east on existing distribution poles (combination of public and private lands) to a location 350 feet south of Old Idyllwild Road. From this location, install approximately 470 feet of fiber optic cable in new underground conduit to cross under the existing Devers-Valley 500 kV ROW to an existing distribution pole. From this location, install fiber optic cable overhead on a combination of distribution and subtransmission poles for approximately 2,100 feet to Wesley Street. The fiber optic cable would then extend east along Wesley Street for approximately 1,300 feet to existing SCE ROW and then north for approximately 3,300 feet to East Lincoln Street. It would transition underground at this location and install approximately 230 feet of fiber optic cable and new underground conduit into the MEER at Banning Substation.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

2. Connect the existing Devers-Valley OPGW to the MEER in Banning Substation.

Install approximately 690 feet of fiber optic cable in a new underground conduit between the existing Devers-Valley No. 2 500 kV structure ~~M21-T3~~ M21 T1 to an existing distribution pole on Coyote Trail approximately 3,200 feet west of Old Idyllwild Road. The new underground conduit would be installed by directional bore. From this existing distribution pole on Coyote Trail, install approximately 4,100 feet of new fiber optic cable east on existing distribution poles (combination of public and private lands) to a location 350 feet south of Old Idyllwild Road. From this location, install approximately 470 feet of fiber optic cable in new underground conduit to cross under the existing Devers-Valley 500 kV ROW to an existing distribution pole. From this location, install fiber optic cable overhead on a combination of distribution and subtransmission poles for approximately 2,100 feet to Wesley Street. The fiber optic cable would then extend east along Wesley Street for approximately 1,300 feet to existing SCE ROW and then north for approximately 3,300 feet to East Lincoln Street. It would transition underground at this location and install approximately ~~230~~ 280 feet of fiber optic cable and new ~~underground conduit into the MEER at Banning Substation to an existing trench in Banning Substation and would additionally~~ install approximately 170 feet of fiber optic cable trench to Banning Substation MEER.

F3-54

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Pages B-16 through 17

F3-55

#### DEIR/DEIS Text:

3. Connect the existing Devers-Valley OPGW to the MEER in Maraschino Substation.

- Install approximately 1,500 feet of fiber optic cable and new underground conduit from the existing Devers-Valley No. 2 500 kV structure M24-T3 to an existing distribution pole on Highland Springs Avenue approximately 300 feet south of Breckenridge Avenue. From this location, install approximately 1,700 feet of fiber optic cable on existing distribution poles along Highland Springs Avenue to approximately 190 feet south of Crooked Creek. At this location, the fiber optic cable would transition underground and extend 2,900 feet in existing underground conduit north to an existing vault approximately 300 feet north of Potrero Boulevard. From the existing vault, approximately 1,000 feet of fiber optic cable and new conduit would be installed to East First Street. From East First Street, the fiber optic cable and conduit would extend west for approximately 600 feet to an existing manhole. From the existing manhole, the fiber optic cable would extend west within existing underground conduit for approximately 12,600 feet to a distribution riser pole 200 feet west of Beaumont Avenue. The fiber optic cable would be installed overhead for approximately 3,200 feet on First Street to Veile Avenue. The fiber optic cable would then extend north on Veile Avenue on existing subtransmission poles for approximately 1,600 feet. From this location, the fiber optic cable would transition underground for 400 feet in an existing underground conduit and cable trench to the MEER located in Maraschino Substation.

4. Connect the Redlands Inland Empire District Office-San Bernardino fiber optic cable through proposed conduit and on proposed and existing poles.

- From the MEER located inside San Bernardino approximately 2,000 feet of fiber optic cable would be installed in an existing conduit and cable trench to a riser pole located outside of San Bernardino Substation on San Bernardino Avenue. From this location, approximately 1,260 feet of fiber optic cable would be installed on existing subtransmission poles extending east to Marigold Avenue. From this location, the telecommunications facilities would then be co-located on the newly relocated San Bernardino-Timoteo 66 kV Subtransmission Line. The co-location of telecommunications would require approximately 6,140 feet of fiber optic cable be installed on new subtransmission structures in private and public rights-of-way to the first structure on Bryn Mawr Avenue just north of the proposed subtransmission TSP riser pole. The telecommunications facilities would transition underground at this location which would require the installation of approximately 560 feet of new conduit and fiber optic cable to an existing pole on the south side of Redlands Boulevard just west of Bryn Mawr Avenue. At this location, the new fiber optic cable would then transition overhead via a telecommunications riser and would connect to the existing fiber optic cable.

#### SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

3. Connect the existing Devers-Valley OPGW to the MEER in Maraschino Substation.

- Install approximately 3,500 425 feet of fiber optic cable and new underground conduit from the existing Devers-Valley No. 2 500 kV structure M24-T3-T1 to an existing distribution vault located on the west side of Highland Springs Avenue and the north boundary of the SCE 500kV right of way. From this location fiber optic cable would be installed north approximately 5,565 feet in existing conduit to an existing distribution vault approximately 300 feet north of Potrero Boulevard, pole on Highland Springs Avenue approximately 300 feet south of Breckenridge Avenue. From this location, install approximately 1,700 feet of fiber optic cable on existing distribution poles along Highland Springs Avenue to approximately 190 feet south of Crooked Creek. At this location, the fiber optic cable would transition underground and extend 2,900 feet in existing underground conduit north to an existing vault approximately 300 feet north of Potrero Boulevard. From the existing vault, approximately 1,000 feet of fiber optic cable and new conduit would be installed to East First Street. From East First Street, the fiber optic cable and conduit would extend west for approximately 600 feet to an existing manhole. From the existing manhole, the fiber optic cable would extend west within existing underground conduit for approximately 12,600 feet to a distribution riser pole 200 feet west of Beaumont Avenue. The fiber optic cable would be installed overhead for approximately 3,200 feet on First Street to Veile Avenue. The fiber optic cable would then extend north on Veile Avenue on existing subtransmission poles for approximately 1,600 feet. From this location, the fiber optic cable would transition underground for 400 feet in an existing underground conduit and cable trench to the MEER located in Maraschino Substation.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

As a result of additional engineering analysis, the following changes have been identified:

4. Connect the Redlands Inland Empire District Office-San Bernardino fiber optic cable through proposed conduit and on proposed and existing poles.

- From the MEER located inside San Bernardino approximately 2,000 feet of fiber optic cable would be installed in an existing conduit and cable trench to a riser pole located outside of San Bernardino Substation on San Bernardino Avenue. From this location, approximately 1,260 feet of fiber optic cable would be installed on existing subtransmission poles extending east to Marigold Avenue. From this location, the telecommunications facilities would then be co-located on the newly relocated San Bernardino-Timoteo 66 kV Subtransmission Line. The co-location of telecommunications would require approximately 6,140 feet of fiber optic cable be installed on new subtransmission structures in private and public rights-of-way to the first structure on Bryn Mawr Avenue just north of the proposed subtransmission TSP riser pole. The telecommunications facilities would transition underground at this location which would require the installation of approximately ~~560~~ 400 feet of new conduit and fiber optic cable to an existing pole on the south side of Redlands Boulevard just ~~west-east~~ of Bryn Mawr Avenue. At this location, the new fiber optic cable would then transition overhead via a telecommunications riser and would connect to the existing fiber optic cable.

Please add new language below to the project description.

6. Connect El Casco-Banning Fiber Optic Cable (10132) to Devers-Vista Skywrap (09033) tap to Maraschino substation.

- Install approximately 790 feet of fiber optic cable on existing poles on Oak Valley Parkway west from an existing splice located at Oak View Drive to a distribution pole approximately 300 feet east of Golf Club drive. From this pole install approximately 1,150 feet of fiber optic cable and new conduit west crossing Interstate 10 to an existing distribution vault east of Desert Lawn Drive.

7. Connect El Casco Fiber optic Cable (10132) to Vista-Moreno fiber Optic Cable (10131) tap to El Casco

- Install approximately 615 feet of fiber optic cable in existing underground conduit from a distribution vault on San Timoteo Canyon Road approximately 3,650 feet east of the railroad crossing at the El Casco Substation to the existing an riser pole. New conduit and fiber optic cable would be extended west from the existing conduit approximately 155 feet to an existing distribution pole. From this distribution pole approximately 3,060 feet of overhead fiber optic cable would be installed crossing the railroad to an existing pole with an existing pole on the west side of the access road to the El Casco Substation.

**F3-55  
cont.**



## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page B-17

#### DEIR/DEIS Text:

F3-56

#### 6. Connect Devers-Vista OPGW to the MEER in Banning Substation

- From the new 220 kV structure (Structure 5554), install approximately 500 feet of fiber optic cable and new underground conduit to an existing distribution pole located approximately 660 feet north of Summit Drive on San Geronio Avenue. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in Banning Substation.

#### 7. Connect Devers-Vista OPGW to the MEER in Maraschino Substation

- From the new 220 kV structure (Structure 4537), install approximately 350 feet of fiber optic cable and new underground conduit to an existing manhole located on Oak View Drive approximately 320 feet north of Parkview Street. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in Maraschino Substation.

#### 8. Connect the Devers-Vista OPGW to the MEER in El Casco Substation

- From the new 220 kV structure (Structure 3502), install approximately 200 feet of fiber optic cable and new underground conduit to an existing manhole located in the existing SCE ROW immediately south of the El Casco Substation. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in El Casco Substation.
- From the new 220 kV structure (Structure 3525), install approximately 200 feet of fiber optic cable and new underground conduit to an existing distribution pole located nearby. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in El Casco Substation.

#### 9. Connect the Devers-Vista OPGW and Devers-El Casco OPGW to the MEER in Devers Substation.

- From the new 220 kV structure (Structure 6N07), install approximately 100 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located inside Devers Substation.
- From the new 220 kV structure (Structure 6S07), install approximately 350 feet of fiber optic cable and new underground conduit to an existing cable trench located inside Devers Substation.

#### SCE Comment:

As a result of additional engineering analysis, the following changes have been identified, as a result of the changes please update the numbering of the bullets point as shown below:

#### 68 Connect Devers-Vista OPGW to the MEER in Banning Substation

- From the new 220 kV structure (Structure 5554 ~~4501~~), install approximately 500 feet of fiber cable and new underground conduit to an existing distribution pole located approximately 660 feet north of Summit Drive on San Geronio Avenue. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in Banning Substation.

#### 79. Connect Devers-Vista OPGW to the MEER in Maraschino Substation

- From the new 220 kV structure (Structure 4537 ~~4535~~), install approximately ~~350-2012~~ feet of fiber optic cable and new underground conduit to an existing ~~manhole-distribution pole located on Oak View Drive-Parkway~~ approximately ~~320-690~~ feet ~~north-east of Parkview Street-Noble Creek across from Noble Creek Park.~~ The new fiber optic cable would ~~rise up the distribution pole and~~ connect ~~in that manhole to~~ an existing fiber optic cable that extends to the MEER in Maraschino Substation.

#### 810. Connect the Devers-Vista OPGW to the MEER in El Casco Substation

- From the new 220 kV structure (Structure 3502), install approximately 200 feet of fiber optic cable and new underground conduit to an existing manhole located in the existing SCE ROW immediately south of the El Casco Substation. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in El Casco Substation.
- From the new 220 kV structure (Structure 3525), install approximately 200 feet of fiber optic cable conduit to an existing distribution pole located nearby. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in El Casco Substation.



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

911. Connect the Devers-Vista OPGW and Devers-El Casco OPGW to the MEER in Devers Substation.

- From the new 220 kV structure (Structure ~~6N07~~ 6N10), install approximately ~~100~~ 1,805 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located ~~beside the driveway to the inside~~ Devers Substation. The fiber optic cable would then continue in existing conduit to the 220 kV MEER in Devers Substation.
- From the new 220 kV structure (Structure ~~6S07~~ 6S10), install approximately ~~350~~ 1,110 feet of fiber optic cable and new underground conduit to an existing ~~cable trench located inside~~ manhole located inside WOD Interim Reactors. The fiber optic cable would then continue in existing conduit to the 200kV MEER in Devers Substation.

F3-56  
cont.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-17

DEIR/DEIS Text:

10. Connect the Devers–El Casco OPGW and El Casco–San Bernardino OPGW to the MEER in El Casco Substation.
- From the new 220 kV structure (Structure 4N65), install approximately 850 feet of fiber optic cable and new underground conduit to an existing distribution manhole located outside El Casco Substation.
  - From the new 220 kV structure (Structure 3N02), install approximately 200 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located outside El Casco Substation.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

120. Connect the Devers–El Casco OPGW and El Casco–San Bernardino OPGW to the MEER in El Casco Substation.

- From the new 220 kV structure (Structure 4N65 4N64), install approximately 850 feet of fiber optic cable and new ~~underground~~ conduit to an existing distribution manhole located outside El Casco Substation. From this manhole the fiber optic cable would continue in existing conduit to the 220kV MEER in the El Casco Substation.
- From the new 220 kV structure (Structure 3N02), install approximately 200 ~~350~~ feet of fiber optic cable and new underground conduit to an existing ~~telecommunications manhole located outside El Casco Substation.~~ Cable trench located inside El Casco Substation. The fiber optic cable would then continue to the El Casco 220kV MEER.
- From the new 220 kV structure (Structure 3N02), install approximately 115 feet of fiber optic cable and new underground conduit to new 220 kV structure (Structure 4N64),

F3-57

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page B-18

#### DEIR/DEIS Text:

11. Connect the El Casco–San Bernardino OPGW and San Bernardino–Vista OPGW to the MEER in San Bernardino Substation.

- From the new 220 kV structure (Structure 1E26), install approximately 350 feet of fiber optic cable and new underground conduit to an existing manhole. Install approximately 1,550 feet of fiber optic cable in existing conduit and 60 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.
- From the new 220 kV structure (Structure 1W26), install approximately 350 feet of fiber optic cable and new underground conduit. Install approximately 315 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.

12. Connect the Devers-Vista OPGW to the MEER in Vista Substation. cable and new underground structures to the MEER inside Vista Substation.

Fiber Optic Cable Removal. The removal of the existing fiber optic cable (located on the OHGW) from the existing 220 kV structures is described in Section B.2.1.1, 220 kV Transmission Line Segments. Additionally, removal of the fiber optic portions from the 220 kV existing structures to connections in the field and/or at existing substations would be required and are described below:

- Removal of approximately 250 feet of fiber optic cable from conduit and 600 feet from a cable trench within Vista Substation.
- Removal of approximately 325 feet of fiber optic cable from conduit between existing Structure M17-T2 (existing Devers-Vista No. 2 220 kV structure) and a riser pole 660 feet north of Summit Drive on San Geronimo Avenue.
- Removal of approximately 225 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the manhole located on Oak View Drive approximately 320 feet north of Parkview Street.

#### SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

133. Connect the El Casco–San Bernardino OPGW and San Bernardino–Vista OPGW to the MEER in San Bernardino Substation.

- From the new 220 kV structure (Structure 1E26), install approximately ~~350~~ 40 feet of fiber optic cable and new underground conduit to ~~an existing new~~ manhole. ~~From the new manhole install approximately 490 feet of fiber optic cable and new conduit to an existing manhole inside the San Bernardino Substation. From this existing manhole the fiber optic cable would continue in existing conduit to the MEER inside San Bernardino Substation. Install approximately 1,550 feet of fiber optic cable in existing conduit and 60 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.~~
- From the new 220 kV structure (Structure 1W26), install approximately ~~350~~ 55 feet of fiber optic cable and new underground conduit ~~to the new manhole installed for the route from Structure 1E26. From the new manhole the fiber optic cable would continue in existing conduit to the MEER inside San Bernardino Substation. Install approximately 315 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.~~

142. Connect the Devers-Vista OPGW to the MEER in Vista Substation.

- From the new 220 kV structure (Structure ~~2N37~~ 2N36), install approximately ~~1,000~~ 420 feet of fiber optic cable and new conduit ~~to an existing manhole inside the Vista substation, from the existing manhole install fiber optic cable in existing conduit to the MEER inside Vista Substation, underground structures to the MEER inside Vista Substation.~~

Fiber Optic Cable Removal. The removal of the existing fiber optic cable (located on the OHGW) from the existing 220 kV structures is described in Section B.2.1.1, 220 kV Transmission Line Segments. Additionally, removal of the fiber optic portions from the 220 kV existing structures to connections in the field and/or at existing substations would be required and are described below:

F3-58

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

- Removal of approximately 250 feet of fiber optic cable from conduit and 600 feet from a cable trench within Vista Substation.
- Removal of approximately 325 feet of fiber optic cable from conduit between existing Structure M17-T2 (existing Devers-Vista No. 2 220 kV structure) and a riser pole 660 feet north of Summit Drive on San Geronio Avenue.
- Removal of approximately 2,595 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the riser pole located on Oak View Drive and Oak valley Parkway. Removal of approximately 225 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the manhole located on Oak View Drive approximately 320 feet north of Parkview Street.

**F3-58  
cont.**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-21

F3-59

DEIR/DEIS Text:

Under the heading 220 kV Transmission Line and the discussion of Segment 3B, the bullets under the third paragraph states:

make determinations on the following structures (for lighting) and spans (for marker balls):

- 46 structures and 0 spans in Segment 1
- 6 structures and 14 spans in Segment 2
- 0 structures and 46 spans in Segment 3
- 14 structures and 22 spans in Segment 4
- 60 structures and 2 spans in the eastern portion of Segment 5
- 0 structures and 10 spans in Segment 6

SCE Comment:

Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified:

make determinations on the following structures (for lighting) and spans (for marker balls):

- ~~47~~ 46 structures and ~~0~~ 2 spans in Segment 1
- ~~12~~ 6 structures and 14 spans in Segment 2
- ~~0~~ 8 structures and ~~46~~ 56 spans in Segment 3
- ~~14~~ 16 structures and ~~22~~ 23 spans in Segment 4
- ~~60~~ 88 structures and ~~2~~ 8 spans in the eastern portion of Segment 5
- 0 structures and 10 spans in Segment 6

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page B-21

#### DEIR/DEIS Text:

**220 kV Transmission Line.** SCE anticipates that over the entire length of the Proposed Project (220 kV transmission lines component) approximately 220 structures and spans would be submitted to the FAA in order that the FAA could make the ultimate determinations for potential hazards. The structures requiring notification are more likely to trigger appurtenances that make structures or conductor spans more visible to aircraft. FAA's recommendations could include installation of lights on proposed new structures, or they could suggest installation of orange, yellow and white marker balls on certain conductor spans.

#### SCE Comment:

Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified:

**220 kV Transmission Line.** SCE anticipates that over the entire length of the Proposed Project (220 kV transmission lines component) approximately ~~220~~ 171 structures and 113 spans would be submitted to the FAA in order that the FAA could make the ultimate determinations for potential hazards. The structures requiring notification are more likely to trigger appurtenances that make structures or conductor spans more visible to aircraft. FAA's recommendations could include installation of lights on proposed new structures, or they could suggest installation of orange, yellow and white marker balls on certain conductor spans.

F3-60

### Page B-21

#### DEIR/DEIS Text:

Under the heading of 220 kV Transmission Line and the second paragraph on page B-21 states:

Due to the proximity to the Banning Airport and potential feasibility issues with the route preferred by the Morongo Tribe, SCE submitted early FAA notification and received determinations from the FAA for the structures in the western most portion of Segment 5. FAA has indicated that 18 structures on the west end of the Morongo Reservation would benefit from lighting on the west end of the Morongo Reservation in order to consider them as "no hazard" facilities (see EIR/EIS Appendix 1B) (SCE, 2014).

#### SCE Comment:

Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified:

Due to the proximity to the Banning Airport and potential feasibility issues with the route preferred by the Morongo Tribe, SCE submitted early FAA notification and received determinations from the FAA for the structures in the western most portion of Segment 5. FAA has indicated that 18 structures on the west end of the Morongo Reservation would benefit from lighting on the west end of the Morongo Reservation in order to consider them as "no hazard" facilities (see EIR/EIS Appendix 1B) (SCE, 2014). SCE anticipates four additional structures will benefit from lighting based on final engineering and resubmittal to the FAA.

F3-61

### Page B-22

#### DEIR/DEIS Text:

**Table B-4. Approximate Land Disturbance Summary for the Proposed Project**

#### SCE Comment:

SCE has updated Table B-11 with revised acreages and, therefore, Table B-4 will need to be updated as well.

F3-62

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page B-23**

**DEIR/DEIS Text:**

**B.3.1.1 Staging Areas and other Work Areas**

**Table B-5. Potential Staging Yard Locations**

**Table B-6. Potential Staging Yard Approximate Land Disturbance**

**SCE Comment:**

SCE has included an additional Material Staging Yard, due to the potential for any one of the yards listed in Table B-5 to be occupied and unavailable prior to SCE commencing with construction. SCE has also updated Figure B-16 to include the additional yard. A memo supporting the environmental analysis of this additional yard and concluding that the addition of this yard would not result in any additional impacts beyond those already described in the DEIR/DEIS is attached. See attached file "WODUP\_MatchYardAssessment.pdf".

Yard Name	Location	Condition	Approximate Area (acres)
Match Material and Equipment Staging Area	Southwest corner of E Theodore Street and N Hathaway	Previously Disturbed; Vacant	21

F3-63

**Page B-24**

**DEIR/DEIS Text:**

Modifications or upgrades to the existing Vista, San Bernardino, El Casco, Etiwanda, Timoteo, Tennessee, and Devers Substations would be confined inside each existing site boundary fence for all the facilities.

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Modifications or upgrades to the existing Vista, San Bernardino, El Casco, Etiwanda, ~~Timoteo, Tennessee~~, and Devers Substations would be confined inside each existing site boundary fence for all the facilities.

F3-64

**Page B-27**

**DEIR/DEIS Text:**

Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.~~

F3-65

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-27

DEIR/DEIS Text:

Work at Etiwanda Substation would occur within the existing Mechanical and Electrical Equipment Room (MEER) and include replacement of protective relay equipment. Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Work at Etiwanda Substation would occur within the existing Mechanical and Electrical Equipment Room (MEER) and include replacement of protective relay equipment. ~~Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.~~

F3-66

Page B-27

DEIR/DEIS Text:

Retaining walls may be required along some of the access roads. Retaining wall locations are preliminarily assumed to occur within areas identified for proposed grading. For the purposes of the environmental analysis, it is estimated that the project will have approximately 4,010 linear feet of retaining wall structures spread amongst the various project segments. The specific number of retaining wall structures and locations would be identified during final engineering. Retaining walls could range between 5 and 20 feet in exposed height.

F3-67

Table B-10. Approximate Length of New Retaining Wall Per Segment							
Retaining wall (feet)	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
	0	810	2,050	350	400	400	4,010

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Retaining walls may be required along some of the access roads. Retaining wall locations are preliminarily assumed to occur within areas identified for proposed grading. For the purposes of the environmental analysis, it is estimated that the project will have approximately ~~4,010~~ 3,168 linear feet of retaining wall structures spread amongst the various project segments. The specific number of retaining wall structures and locations would be identified during final engineering. Retaining walls could range between ~~5-20~~ 5-18 feet in exposed height.

The estimated length of new retaining walls for each segment is summarized in Table B-10, Approximate Length of New Retaining Wall per Segment, and shown in Figure B-17.

Table B-10. Approximate Length of New Retaining Wall Per Segment							
Retaining wall (feet)	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
	0	<del>810</del> <u>1,124</u>	<del>2,050</del> <u>1,192</u>	<del>350</del> <u>431</u>	<del>400</del> <u>231</u>	<del>400</del> <u>190</u>	<del>4,010</del> <u>3,168</u>



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page B-28

DEIR/DEIS Text:

Found in Table B-9. Substation Cut/Fill Grading and Surface Improvements Summary

F3-68

**Timoteo Substation**

Substation equipment foundations, cut	Concrete	70	5
Substation equipment foundations, import	Concrete	60	4
Site fill	Soil	10	1

**Tennessee Substation**

Substation equipment foundations, cut	Concrete	30	2
Substation equipment foundations, import	Concrete	40	2
Site cut	Soil	10	—

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

**Timoteo Substation**

Substation equipment foundations, cut	Concrete	70	5
Substation equipment foundations, import	Concrete	60	4
Site fill	Soil	10	1

**Tennessee Substation**

Substation equipment foundations, cut	Concrete	30	2
Substation equipment foundations, import	Concrete	40	2
Site cut	Soil	10	—

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-31

DEIR/DEIS Text:

Table B-11. Transmission Project Land Disturbance					
Project Feature	Site Quantity	Approximate Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored (Temporary)	Approximate Total Acres Permanently Disturbed
Guard structures	667	150 feet × 50 feet	114.8	114.8	0.0
Remove existing lattice steel tower1	408	220 feet × 220 feet	453.3	453.3	0.0
Remove existing tubular steel pole1	5	220 feet × 150 feet	3.8	3.8	0.0
Remove existing 220 kV wood H-frame & wood 3 pole structures1	182	175 feet × 125 feet	91.4	91.4	0.0
Construct new lattice steel tower2	413	220 feet × 220 feet	458.9	355.6	103.3
Construct new tubular steel pole2	76	220 feet × 150 feet	57.6	53.0	4.6
Conductor stringing setup area3	123	600 feet × 150 feet	254.1	254.1	0.0
Conductor splicing setup areas3	14	200 feet × 150 feet	9.6	9.6	0.0
Existing access roads to be improved4	130.0	linear miles × 18 feet	283.6	0.0	283.6
New access roads4	20	linear miles × 18 feet	43.6	0.0	43.6
Crane pads, walls, cut slopes	—	—	2919.7	2840.5	79
Total Estimated Disturbance Acreage	4690.6		4176.3	514.3	

SCE Comment:

As a result of additional engineering analysis, and for consistency with the updated structure counts provided in comments above, the following changes have been identified:

Please make the following revisions to the DEIR language.

F3-69

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Table B-11. Transmission Approximate Land Disturbance

Project Feature	Site Quantity	Approximate Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored (Temporary)	Approximate Total Acres Permanently Disturbed
Guard structures	667	150 feet × 50 feet	114.8	114.8	0.0
Remove existing lattice steel tower <sup>1</sup>	<del>408</del> <u>413</u>	220 feet × 220 feet	<del>453.3</del> <u>458.9</u>	<del>453.3</del> <u>458.9</u>	0.0
Remove existing tubular steel pole <sup>1</sup>	5	220 feet × 150 feet	3.8	3.8	0.0
Remove existing 220 kV wood H-frame & wood 3 pole structures <sup>1</sup>	182	175 feet × 125 feet	91.4	91.4	0.0
Construct new lattice steel tower <sup>2</sup>	<del>443</del> <u>384</u>	220 feet × 220 feet	<del>458.9</del> <u>426.7</u>	<del>455.6</del> <u>330.7</u>	<del>403</del> <u>96</u>
Construct new tubular steel pole <sup>2</sup>	<del>76</del> <u>83</u>	220 feet × 150 feet	<del>57.6</del> <u>62.9</u>	<del>53.0</del> <u>57.9</u>	<del>4.6</del> <u>5.0</u>
Conductor stringing setup area <sup>3</sup>	123	600 feet × 150 feet	254.1	254.1	0.0
Conductor splicing setup area <sup>3</sup>	14	200 feet × 150 feet	9.6	9.6	0.0
Existing access roads to be improved <sup>4</sup>	130.0	linear miles × 18 feet	283.6	0.0	283.6
New access roads <sup>4</sup>	20	linear miles × 18 feet	43.6	0.0	43.6
Crane pads, walls, cut slopes	—	—	2919.7	2840.5	79
Total Estimated Disturbance Acreage			<del>4690.6</del> <u>4669.2</u>	<del>4176.3</del> <u>4161.8</u>	<del>544.3</del> <u>507.5</u>

F3-69  
cont.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page B-31

#### DEIR/DEIS Text:

Under Table B-11. Transmission Approximate Land Disturbance states:

Source: SCE, 2013.

- 1 - Includes the removal of existing conductor, teardown of existing structure, and removal of foundation 2' below ground surface.
- 2 - Includes structure assembly& erection conductor& OPGW installation. Area to be restored after construction. Portion of ROW within 20' of ALL structures to remain cleared of vegetation. Permanently disturbed areas for LST = 0.25 acres, TSP=0.06 acres, LWS=0.05 acres, and H-Frame=0.06 acres.
- 3 - Based on 9,000' standard conductor reel lengths, conductor size, number of circuits, route design, and terrain.
- 4 - Based on approximate length of road in miles x driveable road width of 14'-22' with 2' of berm on each side of road.

The disturbed acreage calculations are estimates based upon SCE's preferred area of use for the described project feature, the width of the existing right-of-way, or the width of the proposed right-of-way and, they do not include any new access/spur road information; they are subject to revision based upon final engineering and review of the project by SCE's Construction Manager and/or Contractor awarded project.

Footings/Base Volume and Area Calculations (approximate):

- Average TSP depth 30 feet deep, 7-foot diameter, quantity 1 per TSP: earth removed for footing = 42.8 c.y.; surface area = 38.5 sq.ft.
- Average LWS/Wood pole depth 12 feet deep, 2.5-foot diameter, quantity 1 per LWS/wood pole; earth removed for pole base 2.2 c.y.; surface area = 4.9 sq.ft.
- Average Wood H-Frame depth 12 feet deep, 2.5-foot diameter, qty 2 per H-Frame: earth removed for pole base= 4.4 c.y.; surface area = 9.8 sq.ft.

Permanent areas of disturbance were calculated based on the footprint of the structures with an additional 20-foot buffer around the structures reserved for operation and maintenance purposes and the utilization of the crane pad for O&M activities.

Acres permanently disturbed are assumed to be project areas where the disturbance will continue to be used during Operations and Maintenance (O&M) Activities post construction. Areas that would be stabilized or revegetated per requirements identified in Section 4.4 Biological Resources and not used for O&M have been assumed to be temporarily impacted (Acres to be Restored).

#### SCE Comment:

Please see revised language.

Source: SCE, ~~2013~~ 2015.

- 1 - Includes the removal of existing conductor, teardown of existing structure, and removal of foundation 2' below ground surface.
- 2 - Includes structure assembly& erection conductor& OPGW installation. Area to be restored after construction. Portion of ROW within 20' of ALL structures to remain cleared of vegetation. Permanently disturbed areas for LST = 0.25 acres, TSP=0.06 acres, LWS=0.05 acres, and H-Frame=0.06 acres.
- 3 - Based on 9,000' standard conductor reel lengths, conductor size, number of circuits, route design, and terrain.
- 4 - Based on approximate length of road in miles x driveable road width of 14'-22' with 2' of berm on each side of road.

F3-70

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

The disturbed acreage calculations are estimates based upon SCE's preferred area of use for the described project feature, the width of the existing right-of-way, or the width of the proposed right-of-way and, they do not include any new access/spur road information; they are subject to revision based upon final engineering and review of the project by SCE's Construction Manager and/or Contractor awarded project.

F3-70  
cont.

Footings/Base Volume and Area Calculations (approximate):

- Average TSP depth 30 feet deep, 7-foot diameter, quantity 1 per TSP: earth removed for footing = 42.8 c.y.; surface area = 38.5 sq.ft.
- Average LWS/Wood pole depth 12 feet deep, 2.5-foot diameter, quantity 1 per LWS/wood pole; earth removed for pole base 2.2 c.y.; surface area = 4.9 sq.ft.
- Average Wood H-Frame depth 12 feet deep, 2.5-foot diameter, qty 2 per H-Frame: earth removed for pole base= 4.4 c.y.; surface area = 9.8 sq.ft.

Permanent areas of disturbance were calculated based on the footprint of the structures with an additional 20-foot buffer around the structures reserved for operation and maintenance purposes and the utilization of the crane pad for O&M activities.

Acres permanently disturbed are assumed to be project areas where the disturbance will continue to be used during Operations and Maintenance (O&M) Activities post construction. Areas that would be stabilized or revegetated per requirements identified in Section 4.4 Biological Resources and not used for O&M have been assumed to be temporarily impacted (Acres to be Restored).

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page B-32

#### DEIR/DEIS Text:

The first paragraph under Table B-12, Subtransmission Approximate Land Disturbance states:

The foundation process begins with the drilling of the holes using truck- or track-mounted excavators with various diameter augers to match the diameter requirements of the structure type. LSTs typically require an excavated hole approximately 3 feet to 7 feet in diameter and approximately 15 feet to 50 feet deep; TSPs typically require an excavated hole approximately 5 feet to 12 feet in diameter and approximately 30 feet to 60 feet deep. On average, each footing for a LST structure would project approximately 2 to 5 feet above ground level; TSP footings would project approximately 1 to 3 feet above ground level within franchise areas and approximately 2 to 4 feet above ground level in uninhabited areas.

#### SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

The foundation process begins with the drilling of the holes using truck- or track-mounted excavators with various diameter augers to match the diameter requirements of the structure type. LSTs typically require an excavated hole approximately 3 feet to 7 feet in diameter and approximately 15 feet to 50 feet deep; TSPs typically require an excavated hole approximately 5 feet to ~~12~~ 14 feet in diameter and approximately 30 feet to 60 feet deep. On average, each footing for a LST structure would project approximately 2 to 5 feet above ground level; TSP footings would project approximately 1 to 3 feet above ground level within franchise areas and approximately 2 to ~~4~~ 5 feet above ground level in uninhabited areas.

F3-71

### Page B-33

#### DEIR/DEIS Text:

The first sentence/paragraph on page B-33 states:

each site, LSTs would require approximately 20 to 310 cubic yards of concrete delivered to each structure location and, TSPs would require approximately 25 to 270 cubic yards of concrete delivered to each structure location.

#### SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

each site, LSTs would require approximately 20 to 310 cubic yards of concrete delivered to each structure location and, TSPs would require approximately 25 to ~~270~~ 370 cubic yards of concrete delivered to each structure location.

F3-72

### Page B-45

#### DEIR/DEIS Text:

##### B.3.5.1 Access

Once the underground infrastructure is in place, the crews would install cable in two of the four conduits.

#### SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Once the underground infrastructure is in place, the crews would install cable in two of the ~~four~~ six conduits.

F3-73

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-46

DEIR/DEIS Text:

Project Feature	Site Quantity	Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored	Approximate Total Acres Permanently Disturbed
Vault	10	55' × 40'	0.5	0.5	0

F3-74

SCE Comment:

Project Feature	Site Quantity	Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored	Approximate Total Acres Permanently Disturbed
Vault/Manhole	10	55' × 40'	0.5	0.5	0

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-47

DEIR/DEIS Text:

***Underground Telecom Facilities Installation – Fiber Optic Cable***

New underground conduit and structures would typically be installed using a backhoe. The trench would be excavated to approximately 12 to 18 inches wide and a minimum of approximately 36 inches deep. The ground disturbance area for the trenching would be approximately 25 feet wide by the specific length of the excavation. PVC conduit would be placed in the trench and covered with approximately 8 inches of concrete slurry, then backfilled and compacted. For manholes and pull boxes, a hole is excavated between approximately 4 to 10 feet deep, 5 to 8 feet long, and 4 to 8 feet wide. The ground disturbance area for the manhole installation is approximately 40 feet wide by 50 feet long. The disturbance is due to activities associated with the conduit and structure installation and concrete encasement. The manhole or pull box would be lowered into place, connected to the conduits, and backfilled with 2-sack concrete/sand slurry. Excess soil would be hauled to an approved disposal facility in accordance with all applicable laws or may be used as fill material for transmission, subtransmission, distribution, or substation project elements. Construction activities would typically include the use of a backhoe, dump trucks, crew trucks, and concrete trucks. See Figure B-23, Typical Telecommunications Duct Bank, for the standard telecommunications duct bank configuration. See Figure B-24, Typical Manhole Design, for the standard manhole configuration.

The fiber optic cable would be installed throughout the length of the underground conduit and structures by first installing an innerduct, which provides for protection and identification of the cable. The innerduct would be pulled in the conduit from structure to structure using a pull rope and pulling machine, or truck-mounted hydraulic capstan. After installation of the innerduct, the fiber optic cable would be pulled through the innerduct using similar equipment.

**SCE Comment:**

As a result of additional engineering analysis, the following changes have been identified:

***Underground Telecom Facilities Installation – Fiber Optic Cable***

New underground conduit and structures would typically be installed using a backhoe. The trench would be excavated to approximately 12 to 18 inches wide and a minimum of approximately 36 inches deep. The ground disturbance area for the trenching would be approximately 25 feet wide by the specific length of the excavation. PVC conduit would be placed in the trench and covered with approximately 8 inches of concrete slurry, then backfilled and compacted. For manholes and pull boxes, a hole is excavated between approximately 4 to 10 feet deep, 5 to 8 feet long, and 4 to 8 feet wide. The ground disturbance area for the manhole installation is approximately 40 feet wide by 50 feet long. The disturbance is due to activities associated with the conduit and structure installation and concrete encasement. The manhole or pull box would be lowered into place, connected to the conduits, and backfilled with 2-sack concrete/sand slurry. Excess soil would be hauled to an approved disposal facility in accordance with all applicable laws or may be used as fill material for transmission, subtransmission, distribution, or substation project elements. Construction activities would typically include the use of a backhoe, dump trucks, crew trucks, and concrete trucks. See Figure B-23, Typical Telecommunications Duct Bank, for the standard telecommunications duct bank configuration. See Figure B-24, Typical Manhole Design, for the standard manhole configuration.

New underground conduit would be installed by direction bore in this manner. Existing utilities that would be crossed or are in close proximity to the bore would be physically located by digging a pot hole with a backhoe or vacuum truck. A bore pit approximately two feet wide and ten feet long is then dug with a backhoe on each end of the proposed bore. The horizontal bore rig is set up at one of the bore pits. Setup includes anchoring the rig to the ground with augers attached to the front. The bore machine spins the drill head while inserting drilling rods behind the head as it is pushed through the ground. Drilling fluid under high pressure assist in drilling, moves the dirt loosened by the drill head, and holds the hole formed in the drilling process. Excess drilling fluid accumulated in the bore pits is vacuumed up and disposed of at safe site. The depth and direction of the bore is monitored and controlled by telemetry between the bore head and a device held on the surface by a worker. The bore head is guided to the second bore pit where the drill head is removed and a reamer is installed on the drilling steel. The conduit that has been glued together and laid in line with the bore is then attached to the reamer. The

F3-75



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

conduit is installed in the bore as the reamer is pulled back to the bore rig. The bore pits are used for other bores going the opposite direction or will be part of the excavation for a manhole.

The fiber optic cable would be installed throughout the length of the underground conduit and structures by first installing an innerduct, which provides for protection and identification of the cable. The innerduct would be pulled in the conduit from structure to structure using a pull rope and pulling machine, or truck-mounted hydraulic capstan. After installation of the innerduct, the fiber optic cable would be pulled through the innerduct using similar equipment.

F3-75  
cont.

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page B-57

##### DEIR/DEIS Text:

Segment 6, Model 2	27.3	31.9
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##### SCE Comment:

Please add Northern for the current values shown and add Southern with the respective values:

Segment 6, Model 2	<u>Northern</u> 27.3	<u>Northern</u> 31.9
	<u>Southern</u> 28.4	<u>Southern</u> 75.3

F3-76

#### Page B-59

##### DEIR/DEIS Text:

- Arranging the conductors in a triangular configuration to maximize field cancellation.
- Placing the conductors for the transmission line in the right-of-way at the greatest distance from buildings housing priority land uses to reduce magnetic field exposure along the entire route, except where the location of existing utilities prevent strategic line placement.
- Moving the conductors further from the edge of the right-of-way near high priority groups including school, day care, hospital and residential land uses.

##### SCE Comment:

Please remove the current options listed and include the common magnetic field reduction options SCE utilizes to comply with the CPUC EMF Policy:

- ~~Arranging the conductors in a triangular configuration to maximize field cancellation.~~
- ~~Placing the conductors for the transmission line in the right-of-way at the greatest distance from buildings housing priority land uses to reduce magnetic field exposure along the entire route, except where the location of existing utilities prevent strategic line placement.~~
- ~~Moving the conductors further from the edge of the right-of-way near high priority groups including school, day care, hospital and residential land uses.~~
- Increasing the distance from electrical facilities by:
  - o Increasing pole (structure) height,
  - o Increasing the width of right-of-way, and/or
  - o Locating power lines closer to the centerline of the corridor.
- Reducing conductor (phase) spacing.
- Arrange conductors to reduce magnetic field.
- Converting single-phase circuits to split-phase circuits.

F3-77

#### Page B-59

##### DEIR/DEIS Text:

**Proposed EMF Reduction Measures.** The Preliminary Field Management Plan for the Proposed Project (EIR/EIS Appendix 4) includes each of these measures, as “no cost” and “low cost” magnetic field reduction steps:

##### SCE Comment:

For clarification, please make the following revision:

**Proposed EMF Reduction Measures.** The Preliminary Field Management Plan for the Proposed Project (EIR/EIS Appendix 4) includes each of these measures, as “no cost” ~~and or~~ “low cost” magnetic field reduction steps:

F3-78

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-58

DEIR/DEIS Text:

Segment 6, Model 2

27.3

31.9

SCE Comment:

Please add Northern for the current values shown and add Southern with the respective values:

Segment 6, Model 2

Northern 13.0 Northern 0.9 Northern 137.2 Northern 54.8

Southern 156.2 Southern 53.9 Southern 164.0 Southern 63.9

F3-79

Page B-63

DEIR/DEIS Text:

APM-BIO-9

**Jurisdictional Water Permits.** Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA and the SWRCB appropriate Regional Water Quality Control Boards in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits.

The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, the EPA and the SWRCB Regional Boards as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA, SWRCB, and CDFW.

Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP

SCE Comment:

For clarification regarding agency involvement for jurisdictional water permits for the Proposed Project, please make the following revision:

APM BIO-9

**Jurisdictional Water Permits.** Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA and the SWRCB appropriate Regional Water Quality Control Boards in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits.

The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, the EPA and the SWRCB Regional Boards as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA, SWRCB, and CDFW.

Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.

F3-80

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page B-67**

**DEIR/DEIS Text:**

**Project 1:** Connecting to Blythe-Eagle Mountain 161 kV line (CAISO Queue 421)

**F3-81**

**SCE Comment:**

SCE is aware that the Point of Interconnection for this project was changed from Blythe – Eagle Mountain 161kV to Red Bluff Substation 220 kV bus. Please make the following revision:

**Project 1:** Connecting to Blythe-Eagle Mountain 161 kV line Red Bluff Substation 220 kV bus (CAISO Queue 421)

**Page B-67**

**DEIR/DEIS Text:**

**Table B-22. Connected Actions – Solar Generation Projects**

**Confidential Projects Requesting Interconnection**

**Project 3:** Connecting at Colorado River Substation 230 kV (CAISO Queue 576)

**F3-82**

**SCE Comment:**

**Known Projects with Interconnection Agreements**

SCE would like to clarify that Project 3 has executed an interconnection agreement in July 2015 that presumes implementation of WOD Upgrade Project and achieving deliverability via Colorado River Substation. The Solar Star Blythe Mesa (Queue 576) was filed at FERC on July 31, 2015.

**Page B-77**

**DEIR/DEIS Text:**

**Figure B-2b**

**F3-83**

**SCE Comment:**

Please see attached file “WODUP\_Figure B-2b\_Rev.pdf” updating Figure B-2b.

**Page B-105**

**DEIR/DEIS Text:**

**Figure B-10**

**F3-84**

**SCE Comment:**

Please see attached file “WODUP\_Figure B-10\_Rev.pdf” updating Figure B-10.

**Page B-125**

**DEIR/DEIS Text:**

**Location 2:** Removal of 12kV and Relocation on the New 66kV Structures.

**F3-85**

**SCE Comment:**

Please remove location 2 from the map and legend, there is no overhead 12kV on Nevada St from Lugonia Ave to Almond Ave.

~~Location 2: Removal of 12kV and Relocation on the New 66kV Structures.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-12

DEIR/DEIS Text:

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NO <sub>x</sub>	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
Timoteo Substation	1.4	0.3	0.1	0.1	6.4
Tennessee Substation	1.5	0.3	0.1	0.1	6.7
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	6,948.0	927.9	489.3	294.6	3,764.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations and revise the totals in the table as follows:

F3-86

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
Timoteo Substation	4.4	0.3	0.1	0.1	6.4
Tennessee Substation	4.5	0.3	0.1	0.1	6.7
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Flv	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	6,948.0 <u>6,945.1</u>	927.9 <u>927.2</u>	489.3 <u>488.6</u>	294.6 <u>294.4</u>	3,764.4 <u>3,751.4</u>
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

F3-86  
cont.

### Responses to Comment Set F3 – Section B Description of the Proposed Project

- F3-27 The commenter states that SCE has proceeded with additional engineering for the Proposed Project during the agencies' preparation of the Draft EIR/EIS in order to meet the in-service date for the West of Devers Upgrade Project. SCE states that these modifications to the Proposed Project description as a result of this additional engineering analysis would generally reduce impacts described in the Draft EIR/EIS. The Project Description (Section B) has been updated with the new information that SCE has provided, and certain of the maps in Appendix 2 (Detailed Maps) have been modified to show the updated tower locations. However, the EIS acknowledges that subsequent "final" engineering may result in ongoing minor changes in the locations of some towers, the heights of towers, and other aspects of the project. For example, Section B.2.1.2 (Transmission Line Infrastructure), states "The types and quantities of proposed structures, groundwire, and conductor to be removed and installed are approximate and subject to change following the completion of final engineering." Overall, Section B references nearly 30 instances where it is stated that final engineering will be needed to determine the exact locations of individual structures, access roads, vaults, shoo flies, pull sites, marker balls, etc.
- F3-28 The commenter states that as a result of additional engineering, the work originally proposed for the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Section B.1 (Description of the Proposed Project, Introduction and Overview) as requested.
- F3-29 The commenter requests that the description of the Proposed Project be revised to note that the Proposed Project would replace the existing structures and conductors primarily within the existing ROW, consistent with the descriptions elsewhere in the document including in Section B.2.6 (Right-of-Way Requirements). The language in Section B.1 (Introduction and Overview) has been revised as requested.
- F3-30 The commenter recommends clarifying the original need for the West of Devers Upgrade Project that was considered in 2005 as compared to the need for today's Proposed Project. Text addressing SCE's requested clarification has been added to the Final EIS in Section B.1.1 (Historical Background in Project Area). See General Response GR-1 (Project Need) for a discussion of purpose and need for the currently Proposed Project.
- F3-31 The commenter states that as a result of additional engineering, the work originally proposed for the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project and requests that the reference to it on EIS page B-1 be removed. There is only one reference to these substations on this page. It was already deleted as noted above in Response to Comment F3-28.
- F3-32 This comment repeats Comments F3-28 and F3-31. Please see Response to Comment F3-28 regarding the Timoteo and Tennessee Substations.
- F3-33 The commenter notes that the Bureau of Indian Affairs will not be approving SCE's construction in the tribal trust lands as noted in Footnote 1 of Section B. Instead, the BIA will consider construction of the Proposed Project as a reasonably foreseeable impact in determining whether or not to approve the ROW grant. The footnote on page B-2 of the Draft EIR/EIS has been updated in the Final EIS to reflect this information by deleting the final sentence as requested in this comment.

- F3-34 The commenter requests that language in Section B.1.1 (Description of the Proposed Project, Historical Background in Project Area) be revised to state that SCE proposes to use “SCE’s standard” conductors for the Proposed Project instead of the current statement that SCE proposes to use “heavier” conductors.
- This change has not been made. The bullet is highlighting the main differences between the DPV2 Project and the current West of Devers Upgrade Project including the replacement of all the structures. While it may be SCE’s standard conductors that are being proposed, these are heavier than existing conductors and the structures are being replaced because of the conductors’ weight, as noted in the section. The commenter apparently agrees that the currently proposed conductors are heavier than those previously proposed for the DPV2 Project as no objection to the reference to their “greater weight” in this section has been made.
- F3-35 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the installation of the 220 kV structures for Segment 1 of the Proposed Project based on the results of SCE’s additional engineering analysis by changing the number of newly installed structures required from 49 to 46. Section B.2.1.1 has been revised in the Final EIS to make this this requested change.
- F3-36 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the removal, and installation and modification of the 220 kV structures for Segment 2 of the Proposed Project based on the results of SCE’s additional engineering analysis by changing the number of existing structures required to be removed from 25 to 23, the number of newly installed structures required from 28 to 25 and the number of existing structures required to be modified from 4 to 6. Section B.2.1.1 has been revised in the Final EIS to make these requested changes.
- F3-37 The commenter requests that Section B.2.1.1 (Project Description, 220 kV Transmission Line Segments) update the description of the installation of the 220 kV structures for Segment 3 of the Proposed Project based on the results of SCE’s additional engineering analysis by changing the number of newly installed structures required from 104 to 102. Section B.2.1.1 has been revised in the Final EIS to make this requested change.
- F3-38 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the removal of the existing 220 kV structures for Segment 4 of the Proposed Project based on the results of SCE’s additional engineering analysis by changing the number of existing structures required to be removed from 161 to 160. Section B.2.1.1 has been revised in the Final EIS to make this requested change.
- F3-39 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the installation and modification of the 220 kV structures for Segment 4 of the Proposed Project based on the results of SCE’s additional engineering analysis, by changing the number of newly installed structures required from 112 to 111 and the number of existing structures required to be modified from 5 to 6. Section B.2.1.1 has been revised in the Final EIS to make these requested changes.
- F3-40 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the removal, installation and modification of the 220 kV structures for Segment 6 of the Proposed Project based on the results



of SCE's additional engineering analysis by changing the number of existing structures required to be removed from 112 to 117, the number of newly installed structures required from 79 to 85 and to delete any reference to the need to modify any existing structures. Section B.2.1.1 has been revised in the Final EIS to make these requested changes.

- F3-41 The commenter requests that Table B-1 (Typical Transmission Structure Dimensions) in Section B.2.1.2 (Description of the Proposed Project, Transmission Line Infrastructure) be revised based on the results of SCE's additional engineering analysis by changing the proposed number of structures from 394 (LST) and 76 (TSP) to 384 (LST) and 83 (TSP); the approximate height above ground from 110-189 feet (LST) and 110-200 feet (TSP) to 110-193 feet (LST) and 110-198 feet (TSP); the approximate pole diameter from 2-7 feet (TSP) to 3-10 feet (TSP) and the approximate auger diameter from 5-12 feet (TSP) to 5-14 feet (TSP). Table B-1 has been revised in the Final EIS to make these requested changes. See Response to Comment F4-1.
- F3-42 The commenter requests that the source for Table B-1 be updated to reflect the current information provided by SCE. The text associated with and below Table B-1 now indicates the 2013 source has been updated by SCE's Comment Letter.
- F3-43 The commenter requests that Footnote 1 under Table B-1 be updated based on the results of SCE's additional engineering analysis to indicate that 34 TSPs, rather than 38 TSPs, are required to be installed in the portion of Segment 5 within the Morongo Reservation. Footnote 1 to Table B-1 has been revised in the Final EIS to make this requested change.
- F3-44 The commenter requests that the description in Section B.2.1.2 (Description of the Proposed Project, Transmission Line Infrastructure) of the lattice steel towers that would be removed be changed based on the results of SCE's additional engineering analysis from 408 to 413. Section B.2.1.2 has been revised in the Final EIS to make this requested change.
- F3-45 The commenter requests that Table B-2 (Transmission 220 kV Removal and Installation Per Segment) in Section B.2.1.2 (Description of the Proposed Project, Transmission Line Infrastructure) be revised due to additional engineering. These changes to the numbers of double-circuit lattice steel towers and tubular steel poles installed and removed and the length of OHGW by segment have been made to the Final EIS. See also Response to Comment F4-1.
- F3-46 The commenter requests that the source for Table B-2 be updated to reflect the current information provided. The text associated with and below Table B-2 now indicates that the 2013 source has been updated by SCE's Comment Letter. See also Response to Comment F4-1.
- F3-47 The commenter states that as a result of additional engineering, the work for the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to the proposed work to replace the circuit breakers and foundations at the Timoteo and Tennessee substations has been stricken from Section B.2.2 (Project Description, Substation Improvements) in the Final EIS as requested.
- F3-48 This comment repeats Comment F3-47. See Response to Comment F3-47.
- F3-49 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. EIS Section B.2.2.6 (Description of the Proposed Project, Timoteo Substation) has been stricken as requested.

- F3-50 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. EIS Section B.2.2.7 (Description of the Proposed Project, Tennessee Substation) has been stricken as requested.
- F3-51 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Section B.2.2.8 (Description of the Proposed Project, Substation Lighting) as requested.
- F3-52 The commenter states that as a result of additional engineering the description of the Dental 12 kV Distribution Circuit should be updated in Section B.2.4 (Description of the Proposed Project, 12 kV Distribution Line Improvements) to include additional discussion of necessary reconductoring, a new overhead three-phase bank (replacing an existing three-phase bank), and four distribution pole replacements. Section B.2.4 has been revised in the Final EIS to make this requested change. These changes would be minor and similar to proposed work that has already been encompassed in the analysis of the Proposed Project. Therefore, there would be no changes to the impact analysis or conclusions in the EIS regarding the distribution relocation component of the project.
- F3-53 The commenter states that as a result of additional engineering the description of the Intern 12 kV Distribution Circuit should be updated in Section B.2.4 (Description of the Proposed Project, 12 kV Distribution Line Improvements) by changing the number of new underbuild subtransmission structures that may be required to be replaced from 11 to 1 and acknowledging that one new subtransmission structure may be required. Section B.2.4 has been revised in the Final EIS to make these requested changes.
- F3-54 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades connecting the existing Devers-Valley OPGW to the MEER in Banning Substation should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address noted minor changes involving the location and extent of this component of the proposed telecommunications system upgrade work. Section B.2.5 has been revised in the Final EIS to make these requested changes. See Responses to Comments F3-55 through F3-58 regarding additional suggested revisions to the proposed telecommunication systems upgrades.
- F3-55 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades connecting the existing Devers-Valley OPGW to the MEER in Maraschino Substation and connecting Connect the Redlands Inland Empire District Office–San Bernardino fiber optic cable should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address minor changes involving the location and extent of these components of the proposed telecommunications system upgrade work. Additionally, the commenter states that two new telecommunication system upgrades should be included in the project description. Section B.2.5 has been revised in the Final EIS to make these requested changes.
- F3-56 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades proposed to be conducted in order to facilitate the connection of existing substations to the new OPGW located on the new 220 kV structures should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address minor changes involving the location and extent of these components of the proposed telecommunications system upgrade work. Additionally, the

new telecommunication system upgrades requested and made in the Final EIS as noted in Response to Comment F3-55 require renumbering these elements. Section B.2.5 has been revised in the Final EIS to make these requested changes.

- F3-57 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades proposed to be conducted in order to facilitate the connection of existing substations to the new OPGW located on the new 220 kV structures should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address minor changes involving the location and extent of these components of the proposed telecommunications system upgrade work. Additionally, the new telecommunication system upgrades requested and made in the Final EIS as noted in Response to Comment F3-55 require renumbering this element. Section B.2.5 has been revised in the Final EIS to make these requested changes.
- F3-58 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades proposed to be conducted in order to facilitate the connection of existing substations to the new OPGW located on the new 220 kV structures should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address minor changes involving the location and extent of these components of the proposed telecommunications system upgrade work. Additionally, the new telecommunication system upgrades requested and made in the Final EIS as noted in Response to Comment F3-55 require renumbering these elements. Section B.2.5 has been revised in the Final EIS to make these requested changes.
- F3-59 The commenter states that as a result of additional engineering and analysis the description of the locations where SCE expects FAA to make determinations on the lighting and marker ball structures should be updated. This change has been made in Section B.2.6.4 (Project Description, Federal Aviation Administration Considerations), indicating the updated numbers of structures and spans requiring lighting or marker ball determinations.
- F3-60 The commenter states that as a result of additional engineering and analysis the number of poles and spans where SCE expects FAA to make determinations on the lighting and marker ball structures should be updated to change the numbers from 220 to 171 structures and add reference to 113 spans. These changes have been made in Section B.2.6.4 (Description of the Proposed Project, Federal Aviation Administration Considerations) in the Final EIS.
- F3-61 The commenter states that as a result of additional engineering and analysis the information regarding the Banning Airport and FAA safety requirements should be updated to indicate that the FAA may indicate that up to four additional structures would benefit from lighting. This change has been made in Section B.2.6.4 (Description of the Proposed Project, Federal Aviation Administration Considerations) in the Final EIS.
- F3-62 The commenter states that as a result of additional engineering and analysis the acreage information in Table B-4 (Approximate Land Disturbance Summary for the Proposed Project) should be updated consistent with the commenter's requested changes to the acreages in Table B-11 as noted in comment F3-69. These changes have been made to Table B-4 in Section B.3.1 (Description of the Proposed Project, General Construction) in the Final EIS.
- F3-63 The commenter has identified the potential need for an additional yard, the Match Material Staging Yard, in the event that one of the other proposed yards is occupied and unavailable prior to SCE commencing construction. The commenter requests that Figures B-5, B-6 and B-16 be revised to include the information provided about this additional yard. A memoran-

dum identifying the site and including a brief environmental analysis of this additional yard was also provided. The SCE memorandum presented as Comment F4-2 presents environmental information about this new yard. The EIS team has reviewed the proposed construction yard and has concluded that it would not create any new or more severe impacts beyond those already described in the Draft EIR/EIS. The yard has been added to Tables B-5 and B-6 in the Final EIS, as well as in Section D, as applicable. See Response to Comment F4-2.

- F3-64 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Section B.3.1.1 (Description of the Proposed Project, Staging Areas and other Work Areas) in the Final EIS as requested.
- F3-65 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Section B.3.2 (Description of the Proposed Project, Modifications to Existing Substations) in the Final EIS as requested.
- F3-66 The commenter repeats Comment F3-65. See Response to Comment F3-65.
- F3-67 The commenter states that as a result of additional engineering the description in Section B.3.3.1 (Description of the Proposed Project, Access, Spur, and Temporary Roads) and in Table B-10 (Approximate Length of New Retaining Wall Per Segment) of the approximate lengths and heights of new retaining walls should be reduced. Section B.3.3.1 and Table B-10 in the Final EIS have been revised to make these requested reductions.
- F3-68 The commenter states that the work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Table B-9 (Substation Cut/Fill Grading and Surface Improvements Summary) in Section B.3.2.1 (Description of the Proposed Project, Substation Ground Surface Improvements) in the Final EIS as requested.
- F3-69 The commenter states that as a result of additional engineering the description of the estimated land disturbance for the Proposed Project transmission structures in Table B-11 in Section B.3.3.3 (Description of the Proposed Project, Foundation Installation) should be revised as indicated in this comment's reproduction of and edits to Table B-11. This change has been made to Table B-11 in the Final EIS.
- F3-70 The commenter requests that the source for Table B-11 be updated to reflect the current information provided. The text included below Table B-11 in the Final EIS now indicates the 2013 source has been updated by SCE's Comment Letter.
- F3-71 The commenter states that as a result of additional engineering the description of the foundation drilling process in Section B.3.3.3 (Description of the Proposed Project, Foundation Installation) should be revised to indicate changes in typical depths. This requested change has been made in the Final EIS.
- F3-72 The commenter states that as a result of additional engineering the description of the amount of concrete delivered to each TSP should be revised in Section B.3.3.3 (Description of the Proposed Project, Foundation Installation) by changing the range from 25-270 cubic yards to 25-370 cubic yards. This change has been made in Section B.3.3.3 in the Final EIS.

- F3-73 The commenter states that as a result of additional engineering the description of the installed cable in the conduits should be revised in Section B.3.5.1 (Description of the Proposed Project, Access) by changing four conduits to six conduits. This change has been made in the Final EIS.
- F3-74 The commenter requests a minor revision be made to the name of a project feature in Table B-15 (Approximate Land Disturbance of Distribution Line Construction) in Section B.3.5.2 (Distribution Land Disturbance) by changing Vault to Vault/Manhole. This change has been made in the Final EIS.
- F3-75 The commenter states that as a result of additional engineering the description of the underground telecom facilities installation should be revised in Section B.3.7.2 (Description of the Proposed Project, Fiber Optic Cable Installation) to describe directional bore construction. This change has been made in the Final EIS.
- F3-76 The commenter requests that additional detail be added to Table B-19 (Magnetic Field Levels along Existing 220 kV Transmission Corridor) in Section B.5.2 (EMF in the Proposed Project Area) in Segment 6, Model 2 to separate Magnetic Field Levels along the existing transmission corridor between the northern and southern areas of this right of way. This requested information has been added in the Final EIS.
- F3-77 The commenter has requested that the SCE EMF Design Guidelines reduction options listed in the Draft EIR/EIS be replaced with common magnetic field reduction options SCE uses to comply with the CPUC EMF Policy. As requested, the text in Section B.5.3 (Field Management Plan for the Proposed Project) has been revised to list the suggested EMF reduction options in the Final EIS.
- F3-78 The commenter requests that the reference to the Proposed EMF Reduction Measures in Section B.5.3 (Project Description, Field Management Plan for the Proposed Project) clarify the reference to “no cost” and “low cost” measures as “no cost” or “low cost”.  
  
This requested change has not been made. SCE’s Preliminary Field Management Plan for the Proposed Project (EIS Appendix 4) refers to the measures as “no cost” and “low cost”, instead of using the term “no cost” or “low cost” as requested in the comment.
- F3-79 The commenter requests that additional detail be added to Table B-20 (Calculated Magnetic Field Levels along Proposed 220 kV Transmission Corridor) in Section B.5.3 (Project Description, Field Management Plan for the Proposed Project) in Segment 6, Model 2 to separate calculated Magnetic Field Levels along the proposed corridor between the northern and southern areas of this right of way. This requested information has been added to the Final EIS.
- F3-80 The commenter requests a revision to APM-BIO-9 in Table B-21 (Applicant Proposed Measures [APMs]) in Section B.6 (Project Description, Applicant Proposed Measures) for clarification purposes. This requested change has been made in the Final EIS. (Note, however, APM-BIO-9 has been superseded by mitigation measures as described in Section D.4 Biological Resources – Vegetation.)
- F3-81 The commenter notes that the interconnection location for Project 1, in Table B-22 (Connected Actions – Solar Generation Projects) in Section B.7.1 (Definition of Connected Action Projects) has been changed from Blythe – Eagle Mountain 161 kV to Red Bluff Substation 220 kV bus. Table B-22 has been revised in the Final EIS. Table A-6 (Project Analysis

Determinations) and Table B-23 (Analysis Assumptions for Confidential Connected Action Projects, All Solar PV) have also been revised to make a similar change in the Final EIS.

- F3-82 The commenter has stated that it would like to clarify that Project 3 in Table B-22 (Connected Actions – Solar Generation Projects) of the Draft EIR/EIS executed an interconnection agreement in July 2015 that presumes implementation of WOD Upgrade Project and achieving deliverability via Colorado River Substation. The Solar Star Blythe Mesa (Queue 576) was filed at FERC on July 31, 2015.

This clarification has been made as a footnote to Table B-22 in the Final EIS. The name of the project has also been updated in Table B-22 and in Table A-6 (Project Analysis Determinations) in Sections A.3 (Definition of Connected Actions and Related Projects). Because connected actions do not drive the determination for mitigation, its placement in Table B-22 and the impact analysis have not been revised in the Final EIS.

- F3-83 The commenter has submitted as an attachment an updated Figure B-2b (Existing and Proposed Corridor Profile – Segment 1) for inclusion in the Final EIS. The figure has been updated in the Final EIS. Please see Response to Comment F4-4.

- F3-84 The commenter has submitted as an attachment an updated Figure B-10 (Typical 220 kV Transmission Structures) for inclusion in the Final EIS. The figure has been updated in the Final EIS. Please see Response to Comment F4-5.

- F3-85 The commenter has requested removal of Location 2 (Removal of 12kV and Relocation on the New 66kV Structures) from the map and legend on Figure B-13 (Proposed Relocated Subtransmission and Distribution Line Routes), because there is no overhead 12 kV on Nevada Street from Lugonia Avenue to Almond Avenue. The requested revision has been made to Figure B-13 in the Final EIS.

- F3-86 The commenter states that as a result of additional engineering analysis the work for Timoteo and Tennessee Substations is no longer needed and Table D.3-8 (Construction Phase Regional Emissions Impacts [lb/day]) should be updated in the Final EIS to reflect new construction-phase emissions given the removal of work at those substations. The table has been updated in the Final EIS to reflect the requested changes.



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Section C Alternatives**

**Page C-3**

**DEIR/DEIS Text:**

**Basic Project Objective 1:** to upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW.

**F3-87**

**SCE Comment:**

Please see SCE's accompanying cover letter and Attachment A: for reasons as to why Basic Project Objective 1 does not sufficiently meet the need for the WOD Upgrade Project.

**Page C-7**

**DEIR/DEIS Text:**

Phased Build Alternative

Fully meets all basic project objectives.

**F3-88**

**SCE Comment:**

Please see SCE's accompanying cover letter and Attachment A: for concerns related to the Phased Build Alternative.

**Page C-8**

**DEIR/DEIS Text:**

500 kV Towers  
Alternative

Fully meets all basic project objectives

**F3-89**

**SCE Comment:**

The conclusion that the 500 kV Towers Alternative meets all basic project objectives is not supported by the information included in the DEIR/DEIS. The DEIR/DEIS did not include a power flow study that would be needed to make such a conclusion.

**Page C-25**

**DEIR/DEIS Text:**

The alternative would reduce environmental impacts, while still providing capacity for all the generation included in the CAISO 2024 Reliability Base Case. This scenario includes 3,754 MW of Total Generation On-line and 6,901 MW of Total Generation Capacity from all renewable and conventional resources, as well as the power flow on the system resulting from import of 1,400 MW from the Imperial Irrigation District into the Los Angeles Basin.

**F3-90**

**SCE Comment:**

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting conclusions that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project as well as and why the CAISO 2024 Reliability Base Case is incorrect for use in considering alternatives to the Proposed Project.

**Page C-38**

**DEIR/DEIS Text:**

The SPS is also known as the existing West of Devers Remedial Action Scheme.

**F3-91**

**SCE Comment:**

For clarification, please make the following revision:

The SPS is also known as the ~~existing West of Devers~~ Devers Remedial Action Scheme.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page C-39

**DEIR/DEIS Text:**

**West of Devers Interim Project.** In 2011, CAISO found that placing series reactors on the Devers–San Bernardino 230 kV line and Devers–El Casco 230 kV line could balance the line loading on the existing WOD transmission lines. These reactors were installed in 2013; when needed, these reactors have been redirecting power flows onto the 500 kV system between the Devers and Valley Substations (also see Section B.1.1, Historical Background in Project Area).

**SCE Comment:**

The WOD interim is in-service all the time, please make the following revision:

**West of Devers Interim Project.** In 2011, CAISO found that placing series reactors on the Devers–San Bernardino 230 kV line and Devers–El Casco 230 kV line could balance the line loading on the existing WOD transmission lines. These reactors were installed in 2013; ~~when needed~~, these reactors have been redirecting power flows onto the 500 kV system between the Devers and Valley Substations (also see Section B.1.1, Historical Background in Project Area).

F3-92



### Responses to Comment Set F3 – Section C Alternatives

- F3-87 Please see General Response GR-2 (Basic Project Objectives).
- F3-88 Please see Responses to Comments F1-5 through F1-15 regarding the Phased Build Alternative.
- F3-89 The commenter states that EIS does not support the conclusion that the 500 kV Towers Alternative meets all basic project objectives. Power flow modeling would not be necessary for this alternative because the electrical configuration of the 220 kV topology would be essentially identical to that of the Proposed Project, with the exception of certain larger capacity conductors and structures. Therefore, power flow performance of this alternative would be nearly identical to or of greater capabilities than that of the Proposed Project.
- F3-90 Please see responses to comments for Comment Set F1 (SCE Cover Letter).
- F3-91 The commenter requested a modification in Section C.6.2.1 (Current Transmission Plans) to indicate that the SPS is also known as the Devers Remedial Action Scheme as opposed to the existing West of Devers Remedial Action Scheme as noted in the Draft EIR/EIS. This suggested revision has been made to the Final EIS.
- F3-92 The commenter states that the West of Devers Interim Project is in service all of the time. Therefore, as suggested, “when needed” has been deleted from the description of its use in Section C.6.2.1 (Current Transmission Plans) of the Final EIS.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.2 Agriculture

#### Page D.2-2

##### DEIR/DEIS Text:

Agriculture plays a large economic role in both Riverside and San Bernardino Counties. In Riverside County, approximately 5 percent of the County's unincorporated areas are designated for agricultural use (County of Riverside 2008a, 2008b). In the 2007 USDA Agricultural Census, there were 3,463 farms in Riverside County with an average size of 102 acres (USDA, 2008). The gross value of the County's agricultural commodities was \$1.25 million in 2012 (14th in the state). Riverside County's top agricultural commodities were milk, ornamental nursery plants, grapes, and hay.

F3-93

##### SCE Comment:

Based on review of the Riverside County Agricultural report referenced, please make the following revision: Agriculture plays a large economic role in both Riverside and San Bernardino Counties. In Riverside County, approximately 5 percent of the County's unincorporated areas are designated for agricultural use (County of Riverside 2008a, 2008b). In the 2007 USDA Agricultural Census, there were 3,463 farms in Riverside County with an average size of 102 acres (USDA, 2008). The gross value of the County's agricultural commodities was \$1.25 million in 2012 (14th in the state). Riverside County's top agricultural commodities were milk, ornamental nursery plants, grapes, and hay.

#### Page D.2-3

##### DEIR/DEIS Text:

In San Bernardino County, approximately 2 percent of the County's unincorporated areas are designated for agriculture (County of San Bernardino, 2009). In 2007, there were 1,405 farms in the County with an average size of 366 acres. The gross value was of the County's agricultural commodities was \$466,505 (24th in the state). San Bernardino County's top agricultural commodities were milk, eggs, cattle, and hay.

F3-94

##### SCE Comment:

Based on review of the San Bernardino County agricultural report referenced, please make the following revision: In San Bernardino County, approximately 2 percent of the County's unincorporated areas are designated for agriculture (County of San Bernardino, 2009). In 2007, there were 1,405 farms in the County with an average size of 366 acres. The gross value was of the County's agricultural commodities in 2012 was ~~\$582,229,000~~ \$466,505 (24 18th in the state). San Bernardino County's top agricultural commodities were milk, eggs, cattle, and hay.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-8 and 9

DEIR/DEIS Text:

D.2.3.2 CEQA Significance Criteria

The significance criteria listed below are based on the Environmental Checklist form in Appendix G of the CEQA guidelines. They are used to determine whether a project and its alternatives would result in significant impacts to agricultural resources as defined by CEQA. According to the CEQA Checklist, a project causes a potentially significant impact if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use;
- Conflict with existing agricultural use, or a Williamson Act contract;
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in the Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
- Result in the loss of forest land or conversion of forest land to non-forest use; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use.

The project vicinity does not contain forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)). Therefore, impacts to forest land are not addressed further in this EIR. Impacts related to Williamson Act lands are also not addressed further because the nearest Williamson Act lands are 0.8 miles from the Proposed Project.

For the purposes this analysis, impacts would be potentially significant if the Proposed Project would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmland), as designated by the Farmland Mapping and Monitoring Program, to non-agricultural use;
- Conflict with existing zoning for agricultural use;
- Involve other changes in the existing environment which, due to their location or nature, would impair the use of agricultural land.

The third criteria addresses impairment of agricultural land rather than conversion in order to better capture indirect impacts and potential impacts to surrounding agricultural operations.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~Involve other changes in the existing environment which, due to their location or nature, would impair the use of agricultural land.~~

~~The third criteria addresses impairment of agricultural land rather than conversion in order to better capture indirect impacts and potential impacts to surrounding agricultural operations.~~

F3-95

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.2-9**

**DEIR/DEIS Text:**

Impact AG-2: Project would conflict with existing zoning for agricultural use. The Proposed Project would cross 267 acres of land zoned for agricultural use. The Proposed Project would be located on land zoned for agriculture in the cities of Banning, Loma Linda, and Redlands and in Riverside County. Agricultural zoning in the project vicinity is described in more detail in Section D.2.1 (Environmental Setting). In addition, City of Grand Terrace uses an Agriculture Overlay Zone in some areas under its jurisdiction, including portions of the project vicinity. Public utility transmission lines and poles are an allowable use in all of the agriculture zones affected by the Proposed Project. Therefore, the Proposed Project would not conflict with the use of lands zoned for agriculture. Potential construction impacts to agricultural operations would be temporary and would not conflict with zoning designations. The use of the transmission line and access roads during operations would be consistent with agricultural zoning.

**SCE Comment:**

Impact AG-2 states that the project does not conflict with zoning for agricultural use but the discussion fails to include an explanation that the CPUC has preemptive jurisdiction over the Proposed Project as explained in Section A.4.3 Other Agencies. It is recommended that the following language be added:

Impact AG-2: The CPUC has preemptive jurisdiction over the Project, as such, the following information is provided for informational purposes only. Project would conflict with existing zoning for agricultural use. The Proposed Project would cross 267 acres of land zoned for agricultural use....

**F3-96**

**Page D.2-9**

**DEIR/DEIS Text:**

Paragraph 2, Sentence 4: The following is stated:

Transmission infrastructure and new roads would permanently convert 3.5 acres of Important Farmland to non-agricultural use.

**SCE Comment:**

Please make the following revisions to acknowledge that tower removals would result in a benefit:

Transmission infrastructure and new roads would permanently convert 3.5 acres of Important Farmland to non-agricultural use. This is an overestimation as it does not take into account acreage that may be converted back to agricultural uses with the removal of the existing transmission lines.

**F3-97**

**Page D.2-10**

**DEIR/DEIS Text:**

**D.2.3.3 Impacts and Mitigation Measures**

***Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land***

Temporary impacts could include damage to equipment, crops, and livestock from increased traffic on farm roads; water and soil contamination; suppression of plant growth by fugitive dust; soil erosion; and the spread of weeds.

**SCE Comment:**

The statement that the Proposed Project could result in damage to equipment and/or damage due to increased traffic is unsubstantiated. Please make the following revision:

Temporary impacts could include damage to equipment, crops, and livestock from increased traffic on farm roads; water and soil contamination; suppression of plant growth by fugitive dust; soil erosion; and the spread of weeds.

**F3-98**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2.10 through 11

DEIR/DEIS Text:

*Mitigation Measures for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land*

**AG-3a Establish agreement and coordinate construction activities with agricultural landowners.**

Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. The purpose of this agreement will be to set forth the use of Prime Farmland, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE.

SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseedling. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.

**SCE Comment:**

Mitigation Measure AG-3a as written is unnecessarily restrictive and disproportionate to the potential temporary impact. AG-3a could result in project delay due to inability to procure agreements mandated by this mitigation measure. In addition, SCE has existing easement rights that grant SCE the right to construct without having to secure an additional agreement within the existing ROW. Please make the following revisions:

**AG-3a Establish agreement and coordinate construction activities with agricultural landowners.** Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall ~~secure a signed agreement~~ coordinate with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) ~~that is currently being used for agricultural purposes and~~ that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. ~~Should SCE require an additional agreement, such as a temporary entry permit or temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing or newly acquired/upgraded easement right to perform construction activities.~~

The purpose of this agreement will be to set forth the use of agriculturally utilized Prime Farmland, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized as feasible, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE and also in accordance with the existing easement language, if construction activities occur within the existing SCE ROW.

SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons as feasible. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE and also in accordance with the existing easement language. This could include activities such as soil preparation, regrading, and reseedling. SCE restoration activities performed will vary dependent upon the language within the existing or newly acquired/upgraded easement document. This

F3-99

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

measure applies to agricultural landowners with agriculturally utilized land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland that is currently utilized for agriculture through the submittal of a signed temporary construction easement or grant of easement agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.

If SCE is unable to coordinate construction activities or enter into a temporary construction easement with any of the land owners, due to an inability to agree to the terms of the agreement or for any other reason, SCE shall notify the CPUC/BLM and the CPUC/BLM shall allow the project construction to continue absent such an agreement.

**F3-99  
cont.**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-11

DEIR/DEIS Text:

Mitigation Measure for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land

AG-3a Establish agreement and coordinate construction activities with agricultural landowners. Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project related activities. The purpose of this agreement will be to set forth the use of Prime Farmland, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE. SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeded. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.

SCE Comment:

Mitigation Measure AG-3a is unnecessarily restrictive and disproportionate to the potential temporary impact. Additionally, AG-3a would allow project opponents the ability to delay the project by refusing to enter into agreements mandated by this mitigation measure.

SCE recommends that mitigation measure AG.3a include the following language:

- Southern California Edison (SCE) shall coordinate with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project related activities. Should SCE require an additional agreement, such as a temporary entry permit or temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing or newly acquired/ upgraded easement right to perform construction activities.
- "...avoiding construction during peak planting, growing, and harvest seasons."
- Peak planting, growing and harvest seasons are undefined times that may vary depending on crop type and the particular landowner. Including such a requirement has the potential to impact SCE's ability to construct the project. As explained in Section B.3.10 Construction Schedule and Sequence, the construction of the Proposed Project would be complex, given the need to keep existing WOD facilities operational during construction and the need to construct safely when in proximity to energized lines. Construction of the Proposed Project is primarily dependent on outages from the CAISO and such a constraint as avoiding construction during peak planting, growing, and harvest seasons which is undefined represents a requirement that is disproportional the impact the document is assessing.
- If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeded. SCE restoration activities performed will vary dependent upon the language within the existing or newly acquired/upgraded easement document.

F3-100



## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page D.2-12

#### DEIR/DEIS Text:

##### D.2.3.5 CEQA Significance Determination for Proposed Project and Connected Actions

***Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III) for Proposed Project; Class II for Connected Actions***

Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use. The scale of this impact is very small, well below the significance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).

#### SCE Comment:

Consistent with the comment provided above, please make the following revision:

***Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III) for Proposed Project; Class II for Connected Actions***

Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use. this would be an overestimation as it does not take into account acreage that may be converted back to agricultural uses with the removal of the existing transmission lines. The scale of this impact is very small, well below the significance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).

### Page D.2-12

#### DEIR/DEIS Text:

##### D.2.3.5 CEQA Significance Determination for Proposed Project and Connected Actions

***Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III) for Proposed Project; Class II for Connected Actions***

Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use. The scale of this impact is very small, well below the significance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).

#### SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

### Page D.2-12

#### DEIR/DEIS Text:

***Impact AG-2: Project would conflict with existing zoning for agricultural use (No Impact for Proposed Project; Class II for Connected Actions)***

Both the Desert Center and the Blythe areas include lands that are enrolled in Williamson Act contracts, as well as lands zoned for agricultural use. Depending on the location of the connected actions in these areas, construction and operation would disturb existing agriculture and may require the cancellation of existing Williamson Act contracts. Typical mitigation for this type of impact would be to establish a Williamson Act agricultural preserve in the event that an existing Williamson Act is cancelled. This would reduce impacts to a less than significant level. Conflicts with other agricultural zoning could be minimized through the creation of an agricultural easement or agricultural land mitigation program. With mitigation if required, impacts to agricultural zoning would be less than significant (Class II).

#### SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-101

F3-102

F3-103



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-13

DEIR/DEIS Text:

**Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)**

The Proposed Project would temporarily disturb a total of 31.6 acres of designated Important Farmland (26.1 acres of Prime Farmland, 4.7 acres of Farmland of Statewide Importance, and 0.8 acres of Unique Farmland). Surrounding agricultural land may also be affected by temporary construction impacts. These impacts would be minimized through the implementation of Mitigation Measures AG-3a (Establish agreement and coordinate construction activities with agricultural landowners), AQ-1a (Control Fugitive Dust), AQ-1b (Control Off-Road Equipment Emissions), LU-2a (Prepare construction notification plan), HH-1a (Prepare a hazardous materials and waste management plan), HH-2a (Prepare a soil management plan), and HH-3a (Identify pesticide/herbicide contamination). With these measures, impacts would be less than significant.

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-104

Page D.2-13

DEIR/DEIS Text:

**Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)**

The Proposed Project would temporarily disturb a total of 31.6 acres of designated Important Farmland (26.1 acres of Prime Farmland, 4.7 acres of Farmland of Statewide Importance, and 0.8 acres of Unique Farmland). Surrounding agricultural land may also be affected by temporary construction impacts. These impacts would be minimized through the implementation of Mitigation Measures AG-3a (Establish agreement and coordinate construction activities with agricultural landowners), AQ-1a (Control Fugitive Dust), AQ-1b (Control Off-Road Equipment Emissions), LU-2a (Prepare construction notification plan), HH-1a (Prepare a hazardous materials and waste management plan), HH-2a (Prepare a soil management plan), and HH-3a (Identify pesticide/herbicide contamination). With these measures, impacts would be less than significant.

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced with respect to connected actions will not be imposed on SCE nor are they required to be implemented prior to construction of the West of Devers project.

F3-105

Page D.2-14

DEIR/DEIS Text:

**Impact AG-2: Project would conflict with existing zoning for agricultural use** Limited areas of land zoned for agriculture would be affected under this alternative. Transmission lines and transmission structures are allowed uses in agriculture zoned areas. The amount of agricultural land affected would be similar under both the Proposed Project and the Tower Relocation Alternative. An extended construction period and the use of temporary shoo-flies would not conflict with agricultural zoning.

SCE Comment:

As explained above, Impact AG-2 states that the project does not conflict with zoning for agricultural use, but the discussion fails to include an explanation that the CPUC has preemptive jurisdiction over the Proposed Project as explained in Section A.4.3 Other Agencies. It is recommended that the following language be added as follows:

**Impact AG-2: The CPUC has preemptive jurisdiction over the Project, therefore, the following information is provided for informational purposes only.** Limited areas of land zoned for agriculture would be affected under this alternative.

F3-106

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-14

DEIR/DEIS Text:

D.2.4.1 Tower Relocation Alternative

*Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class III)*

Moving selected transmission structures 50 feet from their proposed positions would not require changes in the existing environment that would impair the use of agricultural land. The same access roads and the same number of pads would be required as under the Proposed Project. An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land.

SCE Comment:

The statement that "An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land." is inconsistent with findings made for the Proposed Project (which consists of the same type of work) as well as with language further down on the page as follows:

CEQA Significance Determination for Tower Relocation Alternative

*Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)*

Relocating a proposed transmission structure to a new position nearby in the ROW would not impair the use of agricultural land more than it might have been impaired by the Proposed Project. The same mitigation measures applied to the Proposed Project would apply under the Tower Relocation Alternative. These are Mitigation Measure AG-3a, AQ-1a, AQ-1b, LU-2a, HH-1a, HH-2a, and HH-3a, described in Section D.2.3.3. With implementation of these mitigation measures, impacts would be less than significant (Class II).

SCE suggests the following revisions for consistency:

D.2.4.1 Tower Relocation Alternative

*Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land*

~~Moving selected transmission structures 50 feet from their proposed positions would not require changes in the existing environment that would impair the use of agricultural land. The same access roads and the same number of pads would be required as under the Proposed Project. An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land.~~

Relocating a proposed transmission structure to a new position nearby in the ROW would not impair the use of agricultural land more than it would have been impaired by the Proposed Project. The same mitigation measures applied to the Proposed Project would apply to the Tower Relocation Alternative. These are Mitigation Measure AG-3a, AQ-1a, AQ-1b, LU-2a, HH-1a, HH-2a, and HH-3a, described in Section D.2.3.3. With implementation of these mitigation measures, impacts would be less than significant (Class II).

F3-107

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-17

DEIR/DEIS Text:

*Mitigation Measures for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land*

**AG-3a Establish agreement and coordinate construction activities with agricultural landowners.**

Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. The purpose of this agreement will be to set forth the use of Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE.

SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeding. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.

**SCE Comment:**

Mitigation Measure AG-3a as written is unnecessarily restrictive and disproportionate to the potential temporary impact. AG-3a could result in project delay due to inability to procure agreements mandated by this mitigation measure. In addition, SCE has existing easement rights that grant SCE the right to construct without having to secure an additional agreement within the existing ROW. Please make the following revision:

**AG-3a Establish agreement and coordinate construction activities with agricultural landowners.** Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement coordinate with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that is currently being used for agricultural purposes and that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. Should SCE require an additional agreement, such as a temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing easement right to perform construction activities.

The purpose of this agreement will be to set forth the use of agriculturally utilized Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized as feasible, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE and also in accordance with the existing easement language, if construction activities occur within the existing SCE ROW.

SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons as feasible. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE and also in accordance with the existing easement language. This could include activities such as soil preparation, regrading, and reseeding. This measure applies to agricultural landowners with agriculturally utilized land that is impacted by the Proposed Project. SCE shall provide proof of

F3-108

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

the continued use of Important Farmland that is currently utilized for agriculture through the submittal of a signed temporary construction easement or grant of easement agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.

If SCE is unable to coordinate construction activities or enter into a temporary construction easement with any of the land owners, due to an inability to agree to the terms of the agreement or for any other reason, SCE shall notify the CPUC/BLM and the CPUC/BLM shall allow the project construction to continue absent such an agreement.

**F3-108**  
**cont.**

## Responses to Comment Set F3 – Section D.2 Agriculture

F3-93 The commenter requests a typographical correction be made in Section D.2.1.2 (Environmental Setting by Jurisdiction) be made to correct the gross value of Riverside County's agricultural commodities in 2012 from \$1.25 million to \$1.25 billion. This correction has been made in the EIS.

F3-94 The commenter requests a correction in the agricultural commodity value and ranking information provided in Section D.2.1.2 concerning San Bernardino County. This requested correction has been made in the Final EIS.

F3-95 The commenter asserts that significance criteria not found in the CEQA Guidelines are not appropriate for inclusion in the analysis and requests the criterion regarding impairment of use of agricultural land be deleted.

This comment relates to CEQA, not NEPA. CPUC's response is provided here for informational purposes: Not all significance criteria are or must be found in the CEQA Guidelines. They are determined pursuant to the discretion afforded the lead agency, which may use the CEQA Guidelines, but also may consider the nature of a proposed project, environmental conditions, possible effects, and other relevant factors when identifying the applicable thresholds of significance in an EIR. CEQA Guidelines Appendix G: Environmental Checklist Form often is used as a basis for analyses and setting significance criteria. However, as described in the introduction to the checklist, it is a "sample form" that "may be tailored to satisfy individual agencies' needs and project circumstances" and "[t]he sample questions in this form...do not necessarily represent thresholds of significance." For the EIS topic of agriculture, for example, two of the checklist items were included in the analysis and three were omitted, and a one specific to potential impairment of the use of agricultural land was added. No change in the EIS is required or was made as a result of this comment.

F3-96 The commenter requests insertion of a sentence into the text to say the CPUC has preemptive jurisdiction over the Project [on non-federal lands] and that information following in the paragraph cited in the comment is informational only.

The commenter omits the bold font of the sentence, which is a concise impact statement. The text referenced is in Section D.2.3.3 (Impacts and Mitigation Measures) and reads as a single line in bold: **Impact AG-2: Project would conflict with existing zoning for agricultural use.** This is an impact statement presented in the style and form used throughout the EIS for all impact statements. In this position in the text it serves as both the concise statement of the impact and a header to the discussion under it. An impact statement would not include a disclaimer. In Section D.2.2.3 the text clearly states the CPUC has jurisdiction on siting of investor-owned public utility facilities, and such projects are exempt from local zoning. No change in the EIS is required as a result of this comment.

F3-97 The commenter requests acknowledgement that removal of existing transmission line may allow Important Farmland occupied by transmission structures to be available. A sentence has been added to the paragraph noted, indicating that removal of existing structures may result in some previously occupied Important Farmland becoming unoccupied.

F3-98 The commenter feels that linking damage to equipment and damage due to increased traffic on farm roads is unsubstantiated.

Project equipment and vehicles may use farm roads to access some sites. Equipment such as irrigation systems, tanks, or pumps could be inadvertently damaged if located near roads. The word “increased” has been deleted from the phrase “increased traffic on farm roads”, so as to not attribute the potential for damage only to increased traffic.

- F3-99 The commenter says that Mitigation Measure AG-3a is overly restrictive and disproportionate to the temporary impact it addresses. Several modifications and clarifications to the text of the mitigation measure are proposed.

Mitigation Measure AG-3a has been revised in light of this comment in the Final EIS. The BLM agrees that only a nominal amount of agricultural land could be affected. The revised mitigation measure is no less effective than as originally written, but clarifications have been included.

- F3-100 This comment is an additional comment on Mitigation Measure AG-3a. See Response to Comment F3-99, which addresses this comment as well.

- F3-101 This comment is similar to comment F3-97. See Response to Comment F3-97. It is not necessary to repeat the additional sentence.

- F3-102 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. Clarification has been added in Section D.1.5 (Analysis of Connected Actions) of the Final EIS in response to this comment.

- F3-103 This comment is similar to Comment F3-102. See Response to Comment F3-102.

- F3-104 See Response to Comment F3-102.

- F3-105 See Response to Comment F3-102.

- F3-106 This comment is similar to Comment F3-96. See Response to Comment F3-96.

- F3-107 The commenter suggests using the text in one part of Section D.2.4.1 to replace text elsewhere in the section. The EIS has been revised consistent with this comment.

- F3-108 This comment is similar to Comment F3-96 for text in Table D.2-3. (Mitigation Monitoring Program – Agriculture). See Response to Comment F3-96.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.3 Air Quality

#### Page D.3-5

##### DEIR/DEIS Text:

Sensitive receptors in the Blythe Area include agricultural uses, recreational resources, and residences in the City of Blythe and unincorporated Riverside County.

##### SCE Comment:

Please remove "agricultural uses," because agricultural uses are not considered sensitive receptors for air quality. Sensitive receptors in the Blythe Area include ~~agricultural uses~~, recreational resources, and residences in the City of Blythe and unincorporated Riverside County.

F3-109

#### Page D.3-7

##### DEIR/DEIS Text:

The AQMP is the current (2012) comprehensive attainment strategy for ozone and PM2.5. The AQMP identifies the rules and regulations and contingency measures that demonstrate how the region will achieve the necessary overall emission reductions to attain the federal 24-hour PM2.5 standard in 2014, with a possibility of up to a five-year extension by U.S. EPA to 2019, if needed. An update of the plan is planned for 2016. The 2012 AQMP also provides an update to demonstrate progress in attaining the 8-hour ozone standard in 2023 (SCAQMD, 2013).

##### SCE Comment:

It is relevant to note that the 2012 AQMP specifically takes into consideration emissions from the Proposed Project. SCE recommends including the following language when discussing the 2012 AQMP:

Estimated annual NOx emissions on Federal Lands associated with the Proposed Project are described in the 2012 AQMP as follows:

Southern California Edison (SCE) is currently in the process of, or has plans to construct six linear transmission line projects which would traverse federal lands within the jurisdiction of the [SCAQMD]. The projects are: (1) Devers-Palo Verde No. 2 Transmission Project (DPV2); (2) Tehachapi Renewable Transmission Project (TRTP); (3) Falcon Ridge Substation Project (Falcon Ridge); (4) Path 42 Upgrade Project (Path 42); (5) West of Devers Interim Projects (WOD Interim); and (6) West of Devers Upgrade Project (WOD Upgrade). SCE submitted to the District the NOx emissions estimates expected to be generated during the construction of these transmission lines from 2012 to 2022. The total estimated NOx emissions from these six projects within the South Coast Air Basin are 95 tons per year for 2012; 55 tons per year for 2013; 10 tons per year for 2014; 20 tons per year for 2015; 50 tons per year for 2016 and 2017; and 20 tons per year for 2018 through 2022. These emissions have been accounted for in the general conformity set aside account for NOx." (SCAQMD 2012:III-2-53)

F3-110

#### Page D.3-8

##### DEIR/DEIS Text:

D.3.3 Environmental Impacts of the Proposed

##### SCE Comment:

Add "Project" at the end of the heading

D.3.3 Environmental Impacts of the Proposed Project

F3-111



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.3-11**

**DEIR/DEIS Text:**

The factors are used in conjunction with SCE's preliminary understanding of equipment activity and construction schedule, which means that the results are estimates based on assumptions that would be refined by SCE after final engineering.

**SCE Comment:**

SCE would like to clarify that should the assumptions not be changed as a result of final engineering, SCE would not refine the equipment activity and construction schedule from what has been included in this DEIR/DEIS.

**F3-112**

**Page D.3-12**

**DEIR/DEIS Text:**

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
Timoteo Substation	1.4	0.3	0.1	0.1	6.4
Tennessee Substation	1.5	0.3	0.1	0.1	6.7
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	6,948.0	927.9	489.3	294.6	3,764.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

**F3-113**



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**SCE Comment:**

Please remove the following references to Timoteo and Tennessee Substations.

**Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)**

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
Timoteo Substation	4.4	0.3	0.1	0.1	6.4
Tennessee Substation	4.5	0.3	0.1	0.1	6.7
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	6,948.0	945.1	927.9	489.3	294.6
		927.2	488.6	294.4	3751.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

**Page D.3-13**

**DEIR/DEIS Text:**

**Summary for Construction Emissions of Criteria Pollutants.** Controlling dust and equipment exhaust emissions would be necessary to avoid causing any new violations or contributing substantially to existing violations of the ambient air quality standards and to avoid interfering with the established attainment plans. The Proposed Project would be required to implement dust controls required by SCAQMD Rules 403 and 403.1 so that dust does not remain visible in the atmosphere beyond the edge of the right-of-way or create a nuisance off-site.

**SCE Comment:**

In order to remain consistent with SCAQMD Rule 403 (d)(1)(A), SCE recommends referencing "property line" instead of "right-of-way".

**Summary for Construction Emissions of Criteria Pollutants.** Controlling dust and equipment exhaust emissions would be necessary to avoid causing any new violations or contributing substantially to existing violations of the ambient air quality standards and to avoid interfering with the established attainment plans. The Proposed Project would be required to implement dust controls required by SCAQMD Rules 403 and 403.1 so that dust does not remain visible in the atmosphere beyond the edge of the right-of-way property line or create a nuisance off-site.

F3-113

cont.

F3-114

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-13

DEIR/DEIS Text:

F3-115

### Mitigation Measures for Impact AQ-1

**AQ-1a Control fugitive dust.** SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures:

- Traffic speeds on unpaved roads shall not exceed 15 mph.
- A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.
- Unpaved roads, substation areas, and staging areas shall be watered three times daily when being used by construction vehicle traffic, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions. stabilizer to create a surface crust or shall be covered.
- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop height from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.

### SCE Comment:

To maintain consistency with air quality regulations and concerns with implementation and enforcement as currently drafted, please make the following revisions.

Bullet 2: As it related to the requirement to traffic route plan, SCE has already identified access from paved and unpaved roads that have been provided to the CPUC. As a general construction practice, SCE already selects the most efficient route to minimize unpaved road travel. The measure requests SCE to reduce unpaved road travel, however, such a requirement would not result in a substantial or quantifiable reduction in fugitive dust emissions.

Bullet 3: Substation and staging areas (as identified in Table B-5) are going to be rocked and, therefore, stabilized which mitigates the need for watering. SCE intends to comply with Rule 403 to minimize fugitive dust, therefore, prescribing an activity "three times daily" may be insufficient or excessive depending on precipitation and/or soil saturation.

Bullet 7: Due to the potential and frequency of winds to be in excess of 15 mph in the project area the measure has been revised to more suitably reflect the ability to construct the project while maintaining the intent of the regulation. SCE has demonstrated on previous projects within this project area the ability to successfully prevent fugitive dust under high wind conditions during construction.

### Mitigation Measures for Impact AQ-1

**AQ-1a Control fugitive dust.** SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures:

- Traffic speeds on unpaved roads shall not exceed 15 mph. ~~A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites. SCE will provide maps to its construction contractors that show the travel routes that should be followed to minimize unpaved road use.~~
- ~~When being actively used by construction vehicle traffic, unpaved roads and project disturbance areas, substation areas, and staging areas shall be watered, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations, three times daily in sufficient quantities to maintain compliance with AQMD and jurisdictional requirements, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions~~
- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance of no more than 5 feet.
- Soil truckloads it shall be covered and date seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes that cannot be mitigated by approved dust suppression methods. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.

F3-115

cont.

Page D.3-13

DEIR/DEIS Text:

- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Soil truckloads shall be covered and date seals on dump trucks shall be tight.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.

F3-116

SCE Comment:

- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Soil truckloads shall be covered and date seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes that cannot be mitigated by approved dust suppression methods. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.3-14**

**DEIR/DEIS Text:**

The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

**SCE Comment:**

Please add clarifying language as follows:

The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments (i.e. watering, soil binders, etc.) that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

**F3-117**

**Page D.3-14**

**DEIR/DEIS Text:**

Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area.

**SCE Comment:**

Please add clarifying language as follows:

Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area or right-of-way (ROW).

**F3-118**

**Page D.3-19**

**DEIR/DEIS Text:**

***Impact AQ-2: Construction would generate emissions of toxic air contaminants (Class III for Proposed Project; Class II for Connected Actions)***

Construction activities for the connected actions would be in a localized area, unlike the Proposed Project where activities would occur throughout the transmission corridor. The localized nature of the connected action construction could result in excessive concentrations of TACs.....Impacts from the generation of TACs during construction of the connected actions would be less than significant with mitigation (Class II).

**SCE Comment:**

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

**F3-119**

**Page D.3-19**

**DEIR/DEIS Text:**

***Impact AQ-3: Operation, maintenance, and inspections would generate dust and exhaust emissions (Class III for Proposed Project; Class II for Connected Actions)***

The connected actions involve the construction of solar generation facilities in the Desert Center and Blythe areas... The impact of operation, maintenance, and inspection activities in terms of generating dust and exhaust emissions would be less than significant with implementation of recommended mitigation (Class II).

**SCE Comment:**

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

**F3-120**

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.3-24 through 25

**DEIR/DEIS Text:**

**D.3.4.3 Phased Build Alternative**

Impact AQ-1: Construction would generate dust and exhaust emissions of criteria pollutants

Impact AQ-2: Construction would generate emissions of toxic air contaminants (Class III for Proposed Project; Class II for Connected Actions)

Impact AQ-1: Construction would generate dust and exhaust emissions of criteria

**SCE Comment:**

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional emissions impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

F3-121

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-25

DEIR/DEIS Text:

F3-122

### MITIGATION MEASURE

**AQ-1c: Control helicopter emissions.** Helicopter emissions shall be reduced by the following methods and measures:

- Helicopter idling will occur only when necessary for safe operation and emergency readiness purposes.
- Helicopter operators shall use the smallest practical and available helicopter for each lift operation.
- Fugitive dust from the helicopter rotor wash will be reduced through the implementation of the following measures:
  - The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;
  - Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area.
  - Helicopter operations will take flight paths (i.e. elevation above ground) that will eliminate dust emissions from rotor wash when travelling between the helicopter staging area and the work sites.
  - The helicopter work sites shall be watered prior to helicopter visits. Alternatively, other soil stabilizers shall be applied at a frequency necessary to create and maintain a surface soil crust while helicopter visits are occurring at the work site.

<b>Location</b>	Construction activity in all segments.
<b>Monitoring / Reporting Action</b>	CPUC/BLM monitor verifies that helicopter use and helicopter staging areas are managed as specified.
<b>Effectiveness Criteria</b>	Dust caused by rotor wash does not remain visible beyond staging areas or work sites, and helicopter operator contracting agreements include the specifications.

### SCE Comment:

Contracts entered into by SCE and construction contractors require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and lastly, construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please make the following edits:

<b>Location</b>	Construction activity in all segments.
<b>Monitoring / Reporting Action</b>	CPUC/BLM monitor verifies that helicopter use and helicopter staging areas are managed as specified.
<b>Effectiveness Criteria</b>	Dust caused by rotor wash does not remain visible beyond staging areas or work sites, and helicopter operator contracting agreements include the specifications.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-27

**Mitigation Measures for Impact AQ-1**

F3-123

**AQ-1a Control fugitive dust.** SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures:

- Traffic speeds on unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.
- A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.
- Traffic speeds on unpaved roads, substation areas, and staging areas shall be watered three times daily when being used by construction vehicle traffic, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions.
- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Soil truckloads shall be covered and gate seals on dump trucks shall be tight.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.

**SCE Comment:**

To maintain consistency with air quality regulations and to address SCE's concerns with implementation and enforcement as currently drafted in the DEIR/DEIS, please make the following revisions:

**Mitigation Measures for Impact AQ-1**

**AQ-1a Control fugitive dust.** SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures:

- Traffic speeds on unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.
- ~~A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites. SCE will provide maps to its construction contractors that show the travel routes that should be followed to minimize unpaved road use.~~
- ~~When being actively used by construction vehicle traffic, unpaved roads and project disturbance areas, substation areas, and staging areas shall be watered, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations, three times daily in sufficient quantities to maintain compliance with AQMD and jurisdictional requirements, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions.~~
- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

- Soil truckloads shall be covered and gate seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes that cannot be mitigated by approved suppression methods. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule

**F3-123  
cont.**



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.3-28

**DEIR/DEIS Text:**

The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

**SCE Comment:**

To ensure that either watering, soil binders or other methods would be considered appropriate for dust suppression at these locations. Please make the following revision:

The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments (i.e. watering, soil binders, etc.) that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

**F3-124**

### Responses to Comment Set F3 – Section D.3 Air Quality

- F3-109 The commenter requests “agricultural uses” be struck from the list of sensitive receptors in the Blythe area. See Section D.3.1.3 (Air Quality, Environmental Setting for Connected Actions) where agricultural uses are identified as a sensitive receptor. In Section D.2.3.3 (Agriculture, Impacts and Mitigation Measures), Impact AG-3 (Project would involve changes in the existing environment that would impair the use of agricultural land) notes that one effect on agriculture is “suppression of plant growth by fugitive dust.” Mitigation Measure AQ-1a (Control fugitive dust) would minimize this impact, as well as other dust-related impacts. The sentence cited by the commenter in Section D.3.1.3 is modified to change “agricultural uses” to “agriculture.”
- F3-110 The commenter requests that a paragraph from the SCAQMD AQMP be inserted in Section D.3.2.3 (Air Quality, Applicable Regulations, Plans, and Standards, Local). The paragraph is regarding the planned levels of SCE’s actions with regard to the SCAQMD Air Quality Management Plan. The discussion of the applicability of the federal General Conformity rule under Impact AQ-1 is revised to illustrate that certain levels of NO<sub>x</sub> are included in the planning-level emission inventory and accounted for in the SCAQMD General Conformity set aside account specifically for SCE’s major transmission construction activities for 2018 through 2022 (as in Appendix III, p. III-2-53, of the AQMP) (SCAQMD, 2012).
- F3-111 The commenter suggests an edit, which has been made: adding Project at the end of the heading D.3.3 Environmental Impacts of the Proposed Project.
- F3-112 The commenter clarifies that if assumptions on equipment activity and construction schedule are not changed as a result of final engineering, SCE would not refine the equipment activity and construction schedule included in the Draft EIR/EIS. This clarification is noted. For clarity, in Section D.3.3.3 (Air Quality, Impacts and Mitigation Measures) the last sentence in the fourth paragraph has been modified, changing “assumptions would be refined” to “assumptions could be refined” by SCE after final engineering.
- F3-113 The commenter requests that Timoteo and Tennessee Substations be omitted from Table D.3-8 (Construction-Phase Regional Emissions Impacts (lb/day)). SCE has stated elsewhere in its comments that these two substations are no longer part of the Proposed Project. The requested edits have been made and the totals adjusted.
- F3-114 The commenter suggests changing “edge of the right of way” to “edge of the property line” in the Summary of Construction Emissions of Criteria Pollutants discussion in Section D.3.3.3 (Impacts and Mitigation Measures). This edit has been made.
- F3-115 The commenter recommends modifications to Mitigation Measure AQ-1a (Control fugitive dust) in Section D.3.3.3 (Air Quality, Impacts and Mitigation Measures). Portions of the suggested modifications would not be appropriate to implement as they would remove performance standards necessary for satisfactory monitoring or repeat regulatory requirements. Certain portions of the minor clarifications are included in the revisions to the mitigation that appear in the Final EIS.
- F3-116 This comment repeats a portion of Comment F3-115. Please see Response to Comment F3-115.

- F3-117 The commenter requests insertion after “soil amendments” the parenthetical phrase “(i.e., watering, soil binders, etc.)” in Mitigation Measure AQ-1c (Control helicopter emissions). For clarification, in both Mitigation Measure AQ1a (Control fugitive dust) and AQ-1c text has been added listing examples: “(e.g., water, tackifiers, and soil binders).”
- F3-118 The commenter requests the addition of “or right-of-way (ROW)” to in Mitigation Measure AQ-1c (Control helicopter emissions). This edit has been made by adding “or ROW.”
- F3-119 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-120 See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-121 The commenter states that there are additional impacts associated with the Phased Build Alternative that were not addressed in the Draft EIR/EIS. Please see General Response GR-4.
- F3-122 The commenter requests a text deletion in Section D.3.6 (Air Quality, Mitigation Monitoring, Compliance, and Reporting), Table D.3-11 (Mitigation Monitoring Program – Air Quality), for Mitigation Measure AQ-1c (Control helicopter emissions). The commenter notes that SCE’s contracts with construction contractors require compliance with all mitigation measures and that specifically requiring inclusion of this measure in helicopter operator contracting agreements is unnecessary. Since SCE is responsible for ensuring implementation of mitigation measures, the requested edit has been made.
- F3-123 This comment repeats Comment F3-115. See Response to Comment F3-115.
- F3-124 This comment repeats Comment F3-117. See Response to Comment F3-117.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.4 Biological Resources – Vegetation

#### Page D.4-3

##### DEIR/DEIS Text:

One sensitive forbland community is found on the route. The *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is a seasonal community dominated by rancher's fiddleneck (*Amsinckia intermedia*) and numerous native and naturalized annual and perennial forbs and grasses. This alliance occupies upland slopes and valleys, and fallow fields with well-drained loamy soils. The *Amsinckia* Herbaceous Alliance has a Global and State Rarity ranking of G4/S4 (Sawyer et al., 2009), meaning that the community is at fairly low risk of extinction or elimination due to an extensive range or many populations or occurrences, but with possible cause for concern as a result of local recent declines, threats, or other factors. This community is found in one small area in the San Timoteo Badlands along Segment 3, near Mile Point (MP) 7.0.

##### SCE Comment:

The rarity rank of G4/S4 is not high enough to consider it as a significant impact.

CDWF provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: [http://www.dfg.ca.gov/biogeodata/vegcomp/natural\\_comm\\_background.asp](http://www.dfg.ca.gov/biogeodata/vegcomp/natural_comm_background.asp))

The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDDB but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA.

SCE recommends that the reference to this plant community be deleted.

Based on The Manual of California Vegetation (Manual), 2nd edition, *Amsinckia intermedia* does not form an alliance. Rather, it is *A. menziesii* and *A. tessellata* that form the sensitive alliance.

In the Remarks section the manual comments on other *Amsinckia* spp. but not *A. intermedia*. Further, the Alliance that has been reference has the following characteristics, based on the Manual: 1) *A. menziesii* and/or *A. tessellata* is seasonally co-dominant in the herbaceous layer 2) *A. menziesii* > 10% relative cover in herbaceous layer or *Vulpia bromoides* co-dominates with *A. menziesii* and *Plagiobothrys canescens*. DEIR does not provide a valid reference as to why this species was included as independent plant community.

Therefore, the plant community being described in the DEIR may not fall within this plant community alliance. *A. intermedia* does not form a sensitive forbland community based on the current and accepted CDWF sensitive plant community list.

##### Suggested Revision:

One sensitive forbland community is found on the route. The *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is a seasonal community dominated by rancher's fiddleneck (*Amsinckia intermedia*) and numerous native and naturalized annual and perennial forbs and grasses. This alliance occupies upland slopes and valleys, and fallow fields with well-drained loamy soils. The *Amsinckia* Herbaceous Alliance has a Global and State Rarity ranking of G4/S4 (Sawyer et al., 2009), meaning that the community is at fairly low risk of extinction or elimination due to an extensive range or many populations or occurrences, but with possible cause for concern as a result of local recent declines, threats, or other factors. This community is found in one small area in the San Timoteo Badlands along Segment 3, near Mile Point (MP) 7.0.

F3-125

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.4-6**

**DEIR/DEIS Text:**

Aeolian sand narrative

**F3-126**

**SCE Comment:**

For Table D.4-1, Aeolian Sand is a habitat subclass within the Desert Scrub plant community and the narrative should address it as such.

**Page D.4-7**

**DEIR/DEIS Text:**

Stabilized and partially stabilized desert dunes and sand fields are classified by CDFW as G4/S3 (CDFG, 2010), meaning that they are considered vulnerable and at moderate risk of extinction.

**F3-127**

**SCE Comment:**

CDFG 2010 does not recognize and "stabilized and partially stabilized desert dune and sand fields." Further, the G4/S3 classification is reserved for plant communities. In addition, the reference being cited here is a list of sensitive plant communities.

No plant communities are listed for what is being described as Aeolian sand habitat. Therefore, the DEIR/DEIS should not make the assertion that these dunes have been classified under CDFW rarity rankings. Furthermore, the DEIR/DEIS should not conclude that this dune habitat is sensitive based on the information provided. In addition, there are a number of dunes in California authorized for recreational purposes. Simply because Aeolian sand habitat is present does not automatically make it a sensitive resource unless a sensitive plant community also is present.

**Suggested Revision:**

~~Stabilized and partially stabilized desert dunes and sand fields are classified by CDFW as G4/S3 (CDFG, 2010), meaning that they are considered vulnerable and at moderate risk of extinction.~~

**Page D.4-8**

**DEIR/DEIS Text:**

Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations, depicts the locations of federal- and state-listed and state designated species of special concern that were observed during surveys conducted between 2011 and 2013.

**F3-128**

**SCE Comment:**

Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations, depicts the locations of federal- and state-listed and state designated ~~species of special concern~~ rare plants that were observed during surveys conducted between 2011 and 2013.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.4-9

**DEIR/DEIS Text:**

***California Department of Fish and Wildlife Jurisdiction***

All of the potential USACE jurisdictional areas would also be considered CDFW jurisdictional. In addition, 196 drainages that did not meet the USACE nexus criteria, but showed evidence of a bed and bank (e.g., not categorized as swales) were also identified and are potentially subject to CDFW jurisdiction. Riparian vegetation, such as willows and mulefat, associated with these drainages is also potentially under CDFW jurisdiction.

**SCE Comment:**

As Morongo lands are not subject to the state's jurisdiction and SCE did not conduct a significant nexus determination, the following clarification is recommended:

***California Department of Fish and Wildlife Jurisdiction***

All of the potential USACE jurisdictional areas outside of those found on the Morongo Indian Reservation land would also be considered CDFW jurisdictional. In addition, 196 drainages that did not meet the USACE nexus criteria, but showed evidence of a bed and bank (e.g., not categorized as swales) were also identified and are potentially subject to CDFW jurisdiction. Riparian vegetation, such as willows and mulefat, associated with these drainages is also potentially under CDFW jurisdiction.

F3-129

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-9

DEIR/DEIS Text:

***Regional Water Quality Control Board Jurisdiction***

Areas of potential Regional Water Quality Control Board (RWQCB) jurisdiction coincide with the identified limits of potential USACE jurisdiction, per the September 2004 Workplan (SWRCB, 2004). These areas may be subject to RWQCB jurisdiction through provisions in the CWA.

In addition, areas that are potentially subject to CDFW jurisdiction, but do not qualify as USACE jurisdiction (i.e., isolated areas with a bed and bank that do not connect to a TNW and isolated wetlands), may also be subject to RWQCB jurisdiction through Porter-Cologne. The drainages in the western half of the Proposed Project study area (Segments 1–4), which flow into the Santa Ana River, will be subject to jurisdiction by Region 8 (Santa Ana RWQCB) of the SWRCB. The drainages in the eastern part of the Proposed Project study area (Segments 4–6), which flow into the Salton Sea, are regulated by Region 7 (Colorado River RWQCB) of the SWRCB. This includes the depressional feature (Drainage 182B) on the reservation (Segment 5). The regional boundary within the Proposed Project study area is approximately the border (generally Highland Springs Avenue) between the cities of Beaumont and Banning in Riverside County.

SCE Comment:

The Proposed Project crosses multiple Regional Board boundaries and tribal land and is subject to regulation under Section 401 by the SWRCB. SCE recommends the following changes;

***State Regional Water Quality Resources Control Board Jurisdiction***

Board (RWQCB) in the western part of the project, and within the jurisdictional boundaries of the Colorado River RWQCB in the eastern part of the project. In situations where projects extend into multiple Regional Board boundaries, the project is subject to regulation by the SWRCB. Areas of potential Regional Water Quality Control Board (RWQCB) SWRCB jurisdiction coincide with the identified limits of potential USACE jurisdiction, per the September 2004 Workplan (SWRCB, 2004). These areas may be subject to RWQCB SWRCB jurisdiction through provisions in the CWA.

In addition, areas that are potentially subject to CDFW jurisdiction, but do not qualify as USACE jurisdiction (i.e., isolated areas with a bed and bank that do not connect to a TNW and isolated wetlands), may also be subject to RWQCB SWRCB jurisdiction through Porter-Cologne. The drainages in the western half of the Proposed Project study area (Segments 1–4), which flow into the Santa Ana River, will be subject to jurisdiction by Region 8 (Santa Ana RWQCB) of the SWRCB. The drainages in the eastern part of the Proposed Project study area (Segments 4–6), which flow into the Salton Sea, are regulated by Region 7 (Colorado River RWQCB) of the SWRCB. This includes the depressional feature (Drainage 182B) on the reservation (Segment 5). The regional boundary within the Proposed Project study area is approximately the border (generally Highland Springs Avenue) between the cities of Beaumont and Banning in River-side County. Additionally, project areas that fall within the Morongo Indian Reservation are not subject to regulation by the SWRCB. Regulation under Section 401 of the Clean Water Act is under the jurisdiction of the U.S. Environmental Protection Agency (EPA).

Page D.4.12

DEIR/DEIS Text:

Devers Staging Yard (Segment 6; Riverside County, CV-MSHCP). Use of the area may result in impacts to disturbed desert scrub (up to 10.0 acres) within the staging yard which could support special-status plant species. No sensitive vegetation communities are present within the disturbance areas. Potential jurisdictional drainage features are present and would be impacted by construction and use of the staging yard.

SCE Comment:

Please make the following revision:

Devers Staging Yard (Segment 6; Riverside County, CV-MSHCP). The Devers Staging Yard is an existing staging yard. Use of the area may result in impacts to disturbed desert scrub (up to 10.0 acres) within the staging yard which could support special-status plant species. No sensitive vegetation communities are present within the disturbance areas. Potential jurisdictional drainage features are present and would be impacted by construction and use of the staging yard.

F3-130

F3-131

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-14

### DEIR/DEIS Text:

Five sensitive vegetation communities are found on Segment 3 (see Section D.4.1.1, Vegetation):

- *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is found in one small area in the Badlands near MP 7.0.

### SCE Comment:

For consistency with the same comment as 4-3, please remove *Amsinckia* Herbaceous Alliance (Fiddleneck Fields):

~~Four~~ Five sensitive vegetation communities are found on Segment 3 (see Section D.4.1.1, Vegetation):

- ~~*Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is found in one small area in the Badlands near MP 7.0.~~

F3-132

Page D.4-16

### DEIR/DEIS Text:

#### Special-status Plants

One special-status species, chaparral sand-verbena (*Abronia villosa* var. *aurita*), has a high potential to occur in Segment 4 and four additional special-status species were observed during surveys: Yucaipa onion (*Allium marvinii*), Plummer's mariposa-lily, smooth tarplant, and Engelmann oak (*Quercus engelmannii*). Please see Table Ap. 7-1 and Figures Ap. 7-3a through Ap. 7-3k, Special-status Species Observations (Appendix 7). Several special-status plant species have a low or moderate potential to occur within Segment 4, including Nevin's barberry and Mojave tarplant.

### SCE Comment:

Please remove the incorrect reference to smooth tarplant as the Botanical Surveys in 2012 and 2013 did not find that species on Segment 4:

#### Special-status Plants

One special-status species, chaparral sand-verbena (*Abronia villosa* var. *aurita*), has a high potential to occur in Segment 4 and ~~four~~ three additional special-status species were observed during surveys: Yucaipa onion (*Allium marvinii*), Plummer's mariposa-lily, ~~smooth tarplant~~, and Engelmann oak (*Quercus engelmannii*). Please see Table Ap. 7-1 and Figures Ap. 7-3a through Ap. 7-3k, Special-status Species Observations (Appendix 7). Several special-status plant species have a low or moderate potential to occur within Segment 4, including Nevin's barberry and Mojave tarplant.

F3-133

Page D.4-16

### DEIR/DEIS Text:

#### D.4.1.2.4 Segment 4: Beaumont and Banning

Segment 4 is approximately 12.0 miles long and extends from the El Casco Substation east to the west-ern edge of the Morongo Indian reservation at San Gorgonio Avenue in the City of Banning; see Figure B-5a, Proposed Transmission Line Route – Segment 4. The entire segment is within Riverside County and within the WR-MSHCP plan area. No part of Segment 4 is covered by the CV-MSHCP, nor is it on BLM or reservation lands; see Figures Ap. 7-1a through Ap. 7-1k, Land Management and Critical Habitat Areas (in Appendix 7).

### SCE Comment:

There is a parcel of Morongo Indian Reservation Land that the ROW Crosses west of Sunset in Banning. Revise the segment description for consistency and update Fig. Ap. 7-1a-1k accordingly:

#### D.4.1.2.4 Segment 4: Beaumont and Banning

Segment 4 is approximately 12.0 miles long and extends from the El Casco Substation east to the western edge of the Morongo Indian reservation at San Gorgonio Avenue in the City of Banning; see Figure B-5a, Proposed Transmission Line Route – Segment 4. The entire segment is within Riverside County and within the WR-MSHCP plan area. The ROW crosses a parcel of Morongo Indian Reservation Land west of Sunset Avenue in Banning. No part of Segment 4 is covered by the CV-MSHCP, nor is it on BLM or reservation lands; see Figures Ap. 7-1a through Ap. 7-1k, Land Management and Critical Habitat Areas (in Appendix 7).

F3-134



Comment Set F3: Southern California Edison Company (cont.)

Page D.4-19

DEIR/DEIS Text:

Three sensitive vegetation communities and habitat types are found on Segment 6 (Section D.4.1.1):

- *Lepidaspartum squamatum* Shrubland Alliance (Scalebroom Scrub) is found along the Whitewater River and several smaller washes.
- *Ericameria paniculata* Shrubland Alliance (Black-stem Rabbitbrush Scrub) is found in a small area near Devers Substation.
- Aeolian (wind-blown) sand habitat is found east of the Whitewater River and in the Whitewater River wash.

SCE Comment:

For consistency with the same comment as 4-7, please delete Aeolian (wind-blown) sand habitat as a sensitive vegetation community:

~~Three~~ Two sensitive vegetation communities and habitat types are found on Segment 6 (Section D.4.1.1):

- *Lepidaspartum squamatum* Shrubland Alliance (Scalebroom Scrub) is found along the Whitewater River and several smaller washes.
- *Ericameria paniculata* Shrubland Alliance (Black-stem Rabbitbrush Scrub) is found in a small area near Devers Substation.
- ~~Aeolian (wind-blown) sand habitat is found east of the Whitewater River and in the Whitewater River wash.~~

F3-135

Page D.4-20

DEIR/DEIS Text:

Examples of sensitive habitats in this area are aeolian sand (described in Section D.4.1.1), including active desert dunes and partially stabilized desert dunes, and desert dry wash woodland.

SCE Comment:

For consistency with the same comment as 4-7, please make the following revision:

Examples of sensitive habitats in this area are ~~aeolian sand (described in Section D.4.1.1), including active desert dunes and partially stabilized desert dunes,~~ and desert dry wash woodland.

F3-136

Page D.4-20

DEIR/DEIS Text:

**Wetlands and other waters.** There are numerous dry (episodic or ephemeral) washes and channels here. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, and RWQCB jurisdiction.

SCE Comment:

Please make the following revision:

**Wetlands and other waters.** There are numerous dry (episodic or ephemeral) washes and channels here. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, ~~SWRCB~~ and ~~RWQCB~~ EPA jurisdiction.

F3-137

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page D.4-21

##### DEIR/DEIS Text:

**Wetlands and other waters.** The Colorado River is located east of Blythe. The river itself is considered waters of the state and waters of the U.S. Riparian and wetland vegetation, wash habitat, and irrigation or drainage canals along the river, its floodplain, and its tributary washes also may meet jurisdictional criteria. Further to the west, outside the agricultural areas, there are numerous dry (episodic or ephemeral) washes and channels. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, and RWQCB jurisdiction. Irrigation channels and stock ponds may be found within the agricultural areas; depending on the situation these may also be jurisdictional.

##### SCE Comment:

There are no proposed impacts to any waters within the Colorado River watershed. SCE recommends that this section be deleted, however if this section should remain, please make the following revision:

**Wetlands and other waters.** The Colorado River is located east of Blythe. The river itself is considered waters of the state and waters of the U.S. Riparian and wetland vegetation, wash habitat, and irrigation or drainage canals along the river, its floodplain, and its tributary washes also may meet jurisdictional criteria. Further to the west, outside the agricultural areas, there are numerous dry (episodic or ephemeral) washes and channels. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, ~~SWRCB~~ and ~~RWQCB~~ EPA jurisdiction. Irrigation channels and stock ponds may be found within the agricultural areas; depending on the situation these may also be jurisdictional.

#### Page D.4-21

##### DEIR/DEIS Text:

**Clean Water Act (33 USC Sections 1251-1376).** Regulates the chemical, physical, and biological integrity of the nation's waters. Section 401 of the Clean Water Act (CWA) requires that an applicant obtain State certification for discharge into waters of the United States. The Regional Water Quality Control Boards administer the certification program in California. Section 404 of the CWA establishes a permit program, administered by the U.S. Army Corps of Engineers (USACE), to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Individual projects may qualify under "Nationwide General Permits," or may require project-specific "Individual Permits."

##### SCE Comment:

Please make the following revision:

**Clean Water Act (33 USC Sections 1251-1376).** Regulates the chemical, physical, and biological integrity of the nation's waters. Section 401 of the Clean Water Act (CWA) requires that an applicant obtain State certification for discharge into waters of the United States. The State Water Resources Control Board and Regional Water Quality Control Boards administer the certification program in California, and the EPA administers the certification program on sovereign tribal land. Section 404 of the CWA establishes a permit program, administered by the U.S. Army Corps of Engineers (USACE), to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Individual projects may qualify under "Nationwide General Permits," or may require project-specific "Individual Permits."

F3-138

F3-139

## Comment Set F3: Southern California Edison Company (cont.)

### Page D.4-23

#### DEIR/DEIS Text:

##### D.4.3.1 Approach to Impact Assessment

The Proposed Project includes a construction phase, projected to take place over approximately 36 to 48 months. Following construction, temporary disturbance areas would be revegetated according to applicable mitigation measures. Revegetation efforts, along with implementation and monitoring of other mitigation measures identified herein, would necessitate ongoing vehicle access and soil disturbance beyond the completion of construction. This phase is referred to as the Proposed Project's "restoration" phase in the following analysis.

Additionally, vehicle access and other project activities would continue during operation and maintenance (O&M), throughout the life of the Proposed Project. Each potential impact to vegetation is described, to indicate whether it is a direct or indirect impact; whether its effects would be permanent, long-term or short-term; and whether it would occur during one or more of the Proposed Project's phases, including construction, restoration, or O&M.

#### SCE Comment:

The Draft EIR/EIS should state that O&M associated with the Proposed Project would be less than or at most equivalent to O&M to the existing facilities in this section. As such, these are not new impacts as compared to existing conditions.

F3-140

### Page D.4-24

#### DEIR/DEIS Text:

##### D.4.3.1.1 Applicant Proposed Measures

The PEA includes a series of Applicant Proposed Measures (APMs) proposed by SCE to reduce or avoid impacts to biological resources. The APMs are considered to be commitments made by SCE, and they are assumed to be implemented in this evaluation of impacts to biological resources. SCE's APMs addressing vegetation and special-status plants are presented in Table D.4-3. APMs that relate strictly to wildlife are presented in Section D.5. The additional mitigation measures recommended in this analysis generally incorporate the APMs, while adding conditions or details to protect resources to the extent feasible. Therefore, the APMs in Table D.4-3 are superseded by mitigation measures provided.

#### SCE Comment:

The quoted text, below, needs clarification, it is not the objective of CEQA or NEPA to protect resources to the extent feasible.

Rather, in the case of CEQA significant impacts must be mitigated to below a level of significance, unless the Lead Agency provides a Statement of Overriding Consideration.

The additional mitigation measures recommended in this analysis generally incorporate the APMs, while adding conditions or details to protect resources to the extent feasible.

F3-141

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-26

### DEIR/DEIS Text:

#### Jurisdictional Water Permits.

Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, and the appropriate Regional Water Quality Control Boards in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits. The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, and the Regional Boards as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE and CDFW.

Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP [Determination of Biologically Equivalent or Superior Preservation] that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.

### SCE Comment:

Please make the following revisions:

#### Jurisdictional Water Permits

Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA, and the appropriate Regional Water Quality Control Boards State Water Resources Control Board in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits. The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, EPA, CDFW, and the SWRCB Regional Boards as appropriate. The plan would describe measures to accomplish restoration or revegetation, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA and CDFW.

Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP [Determination of Biologically Equivalent or Superior Preservation] that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.

F3-142

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-29

DEIR/DEIS Text:

The Proposed Project also would affect wetland or riparian habitat, vegetation and habitat that may support special-status plants or animals, and vegetation types designated by CDFW (CDFG, 2010) as "communities with highest inventory priority." These habitats include alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, desert scrub, riparian woodland, aeolian sand, and grassland/forbland potentially supporting Stephens' kangaroo rat, or native grasslands (i.e., grassland/forbland with 10 percent or greater relative cover of native perennial grasses).

SCE Comment:

Chaparral and desert scrub are not considered sensitive plant communities.

CDFW provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: [http://www.dfg.ca.gov/biogeodata/vegcomp/natural\\_comm\\_background.asp](http://www.dfg.ca.gov/biogeodata/vegcomp/natural_comm_background.asp))

The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDDB but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA.

If these plant communities are included due to their value as special-status species habitat, mitigation should only apply to locations where specific special-status species are known to occur.

Chaparral, Desert Scrub, and Aeolian Sand should be deleted because they are not by themselves sensitive vegetation communities and specific special-status species known to occur in these communities along the ROW are not clearly identified:

The Proposed Project also would affect wetland or riparian habitat, vegetation and habitat that may support special-status plants or animals, and vegetation types designated by CDFW (CDFG, 2010) as "communities with highest inventory priority." These habitats include alluvial scrub, coast live oak woodland, coastal sage scrub, ~~chaparral, desert scrub,~~ riparian woodland, ~~aeolian sand,~~ and grassland/forbland potentially supporting Stephens' kangaroo rat, or native grasslands (i.e., grassland/forbland with 10 percent or greater relative cover of native perennial grasses).

F3-143

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-29

DEIR/DEIS Text:

*Mitigation Measures for Impact VEG-1: Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats.*

**VEG-1a Conduct biological monitoring and reporting.** The following provisions shall apply to the approved project.

**Lead biologist:** SCE shall nominate a lead biologist and submit the nominee's resume to the CPUC and BLM for concurrence, no less than 60 days prior to the start of any ground-disturbing activities, including those occurring prior to site mobilization (including, but not limited to geotechnical borings or hazardous waste evaluations). At minimum the lead biologist will hold a bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field; have at least three years of experience in field biology and at least one year of direct field experience with biological resources found in or near the project area. The resume shall demonstrate to the satisfaction of the CPUC and BLM the appropriate education and experience to accomplish the assigned biological resources tasks.

The lead biologist will be SCE's primary point of contact to CPUC, BLM, CDFW, and USFWS regarding any biological resources issues and implementation of related mitigation measures and permit conditions throughout project construction and post-construction restoration work. In addition, the lead biologist will be responsible for supervising and training biological monitors (below), and preparing and submitting all monitoring reports and notifications (below).

If the lead biologist is replaced, the specified information of the proposed replacement must be submitted to the CPUC and BLM at least ten working days prior to the termination or release of the preceding lead biologist. In an emergency, SCE shall immediately notify the CPUC and BLM to discuss the qualifications and approval of a short-term replacement while a permanent lead biologist is proposed for consideration.

**Biological monitors:** SCE shall assign qualified biological monitors to the project to monitor all work activities during the construction phase.

Monitors are responsible for ensuring that impacts to special-status species, native vegetation, wildlife habitat, and sensitive or unique biological resources are avoided to the fullest extent safely possible. Monitors are also responsible to ensure that work activities are conducted in compliance with APMs, mitigation measures, permit conditions, and other project requirements.

Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.

SCE shall provide training to biological monitors, in addition to WEAP (see Mitigation Measure VEG-1b) and prior to the monitor commencing field duties, on biological resources present or potentially present on the Proposed Project, as well as mitigation measures, permit requirements, project protocols, and the duties and responsibilities of a biological monitor. Biological monitors shall inform construction crews daily of any environmentally sensitive areas (ESAs), nest buffers, or other resource issues or restrictions that affect the work sites for that day. Biological monitors shall communicate with construction supervisors and crews as needed (e.g., at daily tailgate safety meetings ("tailboards"), by telephone, text message, or email) to provide guidance to maintain compliance with mitigation measures and permit conditions. SCE shall ensure that adequate numbers of monitors are assigned to effectively monitor work activities and that communications from biological monitors are promptly directed to crews at each work site for incorporation into daily work activities. If biological monitors are unavailable for a tailboard meeting, the construction supervisors shall communicate all ESA, nest buffers, or other resource restrictions to crews during the meeting. SCE shall ensure that biological monitors are provided with an accurate daily construction work schedule as well as updated information on any alterations to the daily construction work schedule. This information shall also be provided to CPUC monitors. SCE shall ensure that biological monitors are provided with up-to-date biological resource maps and construction maps in hardcopy or digital format. These maps shall also be provided to CPUC monitors. Monitors shall be familiar with the biological resources present or potentially present, ESAs, nest buffers, and any other resource issues at the site(s) they are

F3-144



### Comment Set F3: Southern California Edison Company (cont.)

monitoring, as well as the applicable mitigation measures and permit requirements. Monitors shall exhibit diligence in

- **Final report:** After construction has been completed, a final environmental compliance monitoring report shall be submitted to the CPUC and BLM for review and approval. This report shall be submitted within twelve (12) months of the completion of construction and shall include:
  - A summary of all non-compliance records occurring during the construction phase, and remedial actions applied for each one, with additional explanatory text and explanation of resolution of each substantial non-compliance incident (often termed "Level 3 non-compliance");
  - A summary of all nest buffer incursions, including helicopter incursions, (see Mitigation Measure WIL-1c) occurring during the construction phase, with explanation of follow-up actions and resolution for each one;
  - Final compilations of permanent and temporary impact acreages by habitat and land use jurisdiction;
  - Summaries of all other monitoring reporting requirements, as specified in mitigation measures in the Vegetation and Wildlife Resources sections; and
  - Discussion of "lessons learned" during construction, and recommended or proposed measures to improve compliance for future projects.

**Implementation locations:** San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

#### SCE Comment:

SCE's existing team structure includes a staff Project Lead Biologist assigned to the project. The Project Lead Biologist manages the entire biology field team, is familiar with the biological resources in the project area, and would be the primary point of contact to CPUC, BLM, CDFW, and USFWS staff; thus, therefore there is no reason to "nominate" a lead biologist as indicated in the measure. The Project Lead Biologist, in compliance with the Biological Opinion, will designate a Field Contact Representative (FCR) who will additionally be responsible for compliance with project mitigation measures, field monitors, and conservation measures outlined in the Biological Opinion. The Authorized or Qualified Biologist may also serve as the FCR, and the resumes of the FCR will be submitted to the agencies for approval.

Additionally, this measure does not acknowledge the existing O&M activities occurring along the WOD project ROW. The maintenance currently occurring on the existing lines is greater than or at most equal to the maintenance that will be required for the WOD project. Due to this existing baseline environmental condition, the proposed O&M vegetation and habitat removal impacts would be less than significant without this mitigation measure following construction of the WOD Project.

Lastly, pre-construction activities such as geotechnical investigation and hazardous waste evaluations do not create the same level of impacts as construction activity. Further, a FCR may not be in place during preconstruction activities. As such, a requirement to have a Lead Biologist – or a Field Contact Representative - approved prior to conducting these activities is not necessary as long as SCE avoids impacts to biological resources.

For the reasons stated above, please make the following revisions:

***Mitigation Measures for Impact VEG-1: Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats.***

**VEG-1a Conduct biological monitoring and reporting.** The following provisions shall apply to the approved project.

**Lead biologist:** SCE shall nominate a lead biologist and submit the nominee's resume to the CPUC and BLM for concurrence, no less than 60 days prior to the start of any ground-disturbing activities, including those occurring prior to site mobilization (including, but not limited to geotechnical borings or hazardous waste evaluations). At minimum the lead biologist will hold a bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field; have at least three years of experience in field biology and at least one year of direct field experience with biological resources found in or near the project area. The resume shall demonstrate to the satisfaction of the CPUC and BLM the appropriate education and experience to accomplish the assigned biological resources tasks.

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cont.

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

~~SCE's~~ The lead biologist will be SCE's primary point of contact to CPUC, BLM, CDFW, and USFWS regarding any biological resources issues and implementation of related mitigation measures and permit conditions throughout project construction and post-construction restoration work. In addition, the lead biologist will be responsible have oversight of ~~for~~ supervising and of training biological monitors (below), and preparing and submitting all monitoring reports and notifications (below).

~~If the lead biologist is replaced, the specified information of the proposed replacement must be submitted to the CPUC and BLM at least ten working days prior to the termination or release of the preceding lead biologist. In an emergency, SCE shall immediately notify the CPUC and BLM to discuss the qualifications and approval of a short-term replacement while a permanent lead biologist is proposed for consideration.~~

**Biological monitors:** SCE shall assign qualified biological monitors to the project to monitor all work activities, where special status plant and wildlife, sensitive vegetation communities, special status species habitat and other regulated biological resources have the potential to occur, during the construction phase.

Monitors are responsible for ensuring that impacts to special-status species, sensitive native vegetation communities, special-status species wildlife-habitat, and sensitive or unique biological resources are avoided or minimized to the fullest extent safely possible. Monitors are also responsible to ensure that work activities are conducted in compliance with APMs, mitigation measures, permit conditions, and other project requirements.

Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.

SCE shall provide training to biological monitors, in addition to WEAP (see Mitigation Measure VEG-1b) and prior to the monitor commencing field duties, on biological resources present or potentially present on the Proposed Project, as well as mitigation measures, permit requirements, project protocols, and the duties and responsibilities of a biological monitor.

Biological monitors shall inform construction crews daily of any environmentally sensitive areas (ESAs), nest buffers, or other resource issues or restrictions that affect the work sites for that day. Biological monitors shall communicate with construction supervisors and crews as needed (e.g., at daily tailgate safety meetings ("tailboards"), by telephone, text message, or email) to provide guidance to maintain compliance with mitigation measures and permit conditions. SCE shall ensure that adequate numbers of monitors are assigned to effectively monitor work activities and that communications from biological monitors are promptly directed to crews at each work site for incorporation into daily work activities. If biological monitors are unavailable for a tailboard meeting, the construction supervisors shall communicate all ESA, nest buffers, or other resource restrictions to crews during the meeting. SCE shall ensure that biological monitors are provided with an accurate daily construction work schedule as well as updated information on any alterations to the daily construction work schedule. This information shall also be provided to CPUC monitors.

SCE shall ensure that biological monitors are provided with up-to-date biological resource maps and construction maps in hardcopy or digital format. These maps shall also be provided to CPUC monitors.

Monitors shall be familiar with the biological resources present or potentially present, ESAs, nest buffers, and any other resource issues at the site(s) they are monitoring, as well as the applicable mitigation measures and permit requirements. Monitors shall exhibit diligence in

- **Final report:** After construction has been completed, a final environmental compliance monitoring report shall be submitted to the CPUC and BLM for review and approval. This report shall be submitted within twelve (12) months of the completion of construction and shall include:
  - A summary of all non-compliance records occurring during the construction phase, and remedial actions applied for each one, with additional explanatory text and explanation of resolution of each substantial non-compliance incident (often termed "Level 3 non-compliance");
  - A summary of all nest buffer incursions, including helicopter incursions, (see Mitigation Measure WIL-1c) occurring during the construction phase, with explanation of follow-up actions and resolution for each one;
  - Final compilations of permanent and temporary impact acreages by habitat and land use jurisdiction;

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cont.



**Comment Set F3: Southern California Edison Company (cont.)**

- Summaries of all other monitoring reporting requirements, as specified in mitigation measures in the Vegetation and Wildlife Resources sections; and
- Discussion of "lessons learned" during construction, and recommended or proposed measures to improve compliance for future projects.

**Implementation locations:** San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands)

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cont.**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-31

DEIR/DEIS Text:

Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.

SCE Comment:

Following Clarification Requested:

- SCE Requests to be informed of the duration of the anticipated review period for resumes in order to schedule and retain qualified monitors prior to initiating work for work scheduling purposes.
- Last sentence of this section is very subjective and we request additional detail.

Suggested Revision:

Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. CPUC and BLM, or their designee, will provide concurrence within 10 working days following submittal of resumes. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.

Page D.4-31

DEIR/DEIS Text:

**Biological monitor duties and responsibilities:** Throughout the duration of construction, SCE shall conduct biological monitoring of all work activities in the project area, including work sites, yards, staging areas, access roads, and any area subject to project disturbance. All pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.) and post-construction restoration shall also be monitored by a biological monitor.

SCE Comment:

To ensure implementation for this portion of the mitigation measure is achievable, please include clarification related to the following:

- SCE Requests clarification that not "all" work activities would require monitoring, rather, monitoring would be required where work activities have the potential to impact special-status biological resources.
- Pre-construction

Additionally, please make the following revision:

**Biological monitor duties and responsibilities:** Throughout the duration of construction, SCE shall conduct biological monitoring of all work activities in the project area, including work sites, yards, staging areas, access roads, and any area subject to project disturbance, where there is a potential to impact impact sensitive plant or wildlife resources. All pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.) and Post-construction restoration shall also be monitored by a biological monitor in specific locations where restoration activities have the potential to impact sensitive plant or wildlife resources.

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### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.4-35

##### DEIR/DEIS Text:

- Printed training materials, including photographs and brief descriptions of all special-status plants and animals that may be encountered on the project, including behavior, ecology, sensitivity to human activities, legal protection, penalties for violations, reporting requirements, and protection measures.

##### SCE Comment:

With the widespread availability of portable electronic devices, providing an option for distributing electronic copies will save resources. As such, please make the following revision:

- Printed or electronic copies of training materials, including photographs and brief descriptions of all special-status plants and animals that may be encountered on the project, including behavior, ecology, sensitivity to human activities, legal protection, penalties for violations, reporting requirements, and protection measures.

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#### Page D.4-37

##### DEIR/DEIS Text:

For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall be responsible for a one-time replacement. If a second event occurs, no replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).

##### SCE Comment:

SCE should not be held responsible for events that are beyond SCE's control, acts of God. In the event of a fire, flood, or other disturbance the site conditions within the temporary impact areas may be no different than the surround vegetation. This statement assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas but provides no evidence to support this assumption.

##### Suggested Revision:

For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall not be responsible for replacement. No replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).

F3-148

#### Page D.4-37

##### DEIR/DEIS Text:

On completion of project construction, SCE shall provide CPUC and BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, up to date ortho-rectified aerial imagery of the project area, and summary data of all discrepancies between final engineering and "as-built" conditions for each vegetation or habitat type, within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM).

##### SCE Comment:

Providing updated ortho-rectified aerial imagery is an unnecessary additional expense. Current aerial imagery is readily available from various sources and is accurate. The provided GIS files should be sufficient to validate the actual vs. temporary impact areas.

##### Please make the following revision:

On completion of project construction, SCE shall provide CPUC and BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, up to date ortho-rectified aerial imagery of the project area, and summary data of all discrepancies between final engineering and "as-built" conditions for each vegetation or habitat type, within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM).

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## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-37 through 39

### DEIR/DEIS Text:

**VEG-1d Restore or revegetate temporary disturbance areas.** [Supersedes APM BIO-1 to provide further specificity.] This measure has two parts: Part A and Part B. Part A is applicable to all temporary disturbance areas, and Part B is applicable to disturbance occurring in sensitive vegetation types and special-status species habitats.

For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall be responsible for a one-time replacement. If a second event occurs, no replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control); or investigation by a firefighting agency).

#### **Part A: Habitat restoration and revegetation for all temporary disturbance areas.**

SCE shall prepare and implement a Habitat Restoration and Revegetation Plan (HRRP), to restore or revegetate all temporary disturbance areas, including temporary disturbance areas around tower construction sites, laydown or staging areas, temporary access and spur roads, cut and fill slopes, and locations of existing towers that are removed during construction of the project. For temporary disturbances in agriculture, developed/disturbed, and most grassland/forbland (excluding suitable Stephens' kangaroo rat habitat and any areas with 10 percent or greater relative cover of native perennial grass species), the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion. The goals for sensitive vegetation and special-status species habitat are described in Part B of this Mitigation Measure.

The Draft HRRP shall be submitted to CPUC and BLM review and approval prior to the beginning of ground-disturbing activities. SCE shall incorporate all requested revisions in coordination with the CPUC and BLM and finalize the HRRP within 12 months from the start of construction. For all temporary disturbance areas, the HRRP shall include the following elements:

- A statement of revegetation goals and objectives for each portion of the project area, based on vegetation type and jurisdictional status of each site.
- Quantitative success criteria for each revegetation or restoration site or category. Implementation details, including but not limited to topsoil stockpiling and handling; post-construction site preparation; soil decompaction and recontouring; planting and seeding palettes to include only native, locally sourced materials with confirmed availability from suppliers; fall-season planting or seeding dates.
- Maintenance, including but not limited to irrigation or hand-watering schedule and equipment, erosion control, and weed control.
- Monitoring and Reporting, specifying monitoring schedule and data collection methods throughout establishment of vegetation with key indicators of successful or unsuccessful progress, and quantitative values to objectively determine success or failure at the conclusion of the monitoring period.
- Contingency measures such as re-planting, drainage repairs, adjustments to irrigation or weeding schedule, and extension of maintenance beyond the original schedule, to repair or remediate sites not on track to meet success criteria, or not meeting the criteria at the close of the originally scheduled monitoring period.

The Integrated Weed Management Plan (Mitigation Measure VEG-2a) will be implemented throughout implementation of the HRRP. For all revegetation or restoration areas, only seed or potted nursery stock of locally occurring native species from a local source will be used for revegetation. Seeding and planting will be conducted as described in Chapter 5 of *Rehabilitation of Disturbed Lands in California* (Newton and Claassen, 2003). The list of plants observed during botanical surveys of the project area will be used as a guide to site-specific plant selection.

For all revegetation or restoration areas, the HRRP will include objective, quantifiable success criteria, commensurate with the goals for each site. Monitoring of the reclamation, revegetation, or restoration sites will continue annually for no fewer than five (5) years or until the defined success criteria are achieved, whichever is later. SCE will be responsible for implementing remediation measures as needed. Following remediation work, each site will be subject to the success criteria and monitoring period as required for the initial reclamation, revegetation, or restoration.

F3-150

### Comment Set F3: Southern California Edison Company (cont.)

#### Part B: Additional habitat restoration and revegetation requirements for sensitive vegetation and special-status species habitat.

For temporary disturbances in grassland/forbland that is either suitable Stephens' kangaroo rat habitat, or has 10 percent or greater relative cover of native perennial grass species (see VEG-1c), and in all other vegetation types (alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, desert scrub, riparian woodland, and aeolian sand), the Habitat Restoration and Revegetation Plan will be designed to replace the habitat values present prior to disturbance (i.e., native plant species cover, habitat structure, and soil or substrate conditions). The following performance standards must be met by the end of the monitoring period:

- At least 80 percent of the vegetation cover within the restoration area shall be native species that naturally occur in local native habitats;
- Absolute cover and density of native plant species within the restoration areas shall equal at least 60 percent of the pre-disturbance or reference vegetation cover; and
- The site shall have persisted successfully without irrigation or remedial planting for a minimum of three years prior to completion of monitoring.

For revegetation or restoration in these habitats, the HRRP will include (in addition to the components listed in Part A):

- A map depicting the locations of all temporary disturbance areas in these habitats, including a quantitative evaluation of native grass cover and Stephens' kangaroo rat habitat suitability in all mapped grassland/forbland areas, subject to requirements of Part B;
- An inventory of any temporary disturbance areas that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe (these will be categorized as "long-term disturbance areas," to be addressed under habitat compensation, Mitigation Measure VEG-1e).

**Reporting (for Part A and Part B).** For all revegetation or restoration areas, SCE will provide annual reports to the CPUC and BLM verifying the total vegetation acreage subject to temporary and permanent disturbance, identifying which items of the HRRP have been completed, and which items are still outstanding. The annual reports will also include a summary of the reclamation, revegetation, or restoration activities for the year, a discussion of whether performance standards for the year were met, any remedial actions conducted and recommendations for remedial action, if warranted, that are planned for the upcoming year. Each annual report will be submitted within 90 days after completion of each year of revegetation and restoration work.

**Implementation locations:** Parts A and B of this mitigation measure shall apply as follows: San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

#### SCE Comment:

Included below are concerns related to VEG-1d and suggested revisions:

#### Paragraph 2:

In the event of a fire, flood, or other disturbance beyond the control of SCE, the site conditions within the temporary impact areas may be similar to those of the surrounding vegetation. The DEIR/DEIS assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas, but provides no evidence to support this assumption.

#### Paragraph 3:

"Long-term restoration sites," that cannot be effectively revegetated or restored within the 5-year timeframe will need to be stabilized to prevent the potential for soil erosion. An additional sentence to account for this has been included.

#### Paragraph 13:

If SCE elects to take remedial action to ensure that success criteria are met within the 5-year period, SCE should not be penalized by being obligated to continue monitoring for another 5 years from the point of remedial action. SCE has an incentive to meet success criteria within the 5-year period and resetting the period would diminish the incentive. SCE recommends deletion of last sentence.

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cont.

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Part B, Paragraph 1:

See comments in 4-7. SCE recommends deleting aeolian sand, chaparral, and desert scrub Aeolian sand, as they are not sensitive vegetation communities.

CDFW provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: [http://www.dfg.ca.gov/biogeodata/vegcamp/natural\\_comm\\_background.asp](http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp))

The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDb but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA.

These vegetation communities have the potential to support sensitive wildlife species, however, only those habitats that are occupied require restoration for temporary impacts and compensation for permanent impacts to mitigate significant impacts.

#### Part B, Performance Standard Bullets:

Because this part of the MM seems to apply to grassland habitat considered suitable for SKR and other sensitive plant communities, SCE is requesting modifications to the MM, as described below.

In the project area, some of the plant communities listed do not naturally exhibit 80% relative cover by native species. For example, desert and alluvial areas have a low absolute cover of native species due to large areas of bare ground. Further, many of California's ecosystems are highly invaded, resulting in naturally occurring communities that have less than 80% relative cover of native species. Therefore, the goals for total or absolute as well as native cover should be based on both the absolute and relative coverage attributed to the existing plant communities being replaced. Setting a standard at 80% native species could mean that SCE's restoration efforts must achieve coverage levels that exceed existing values in the on-site or adjacent plant communities.

In addition, cover and density measure the same thing; so the references to both is confusing. SCE recommends using only cover or density in the MM.

Requiring that all restoration sites must persist for at least 3 years without irrigation before monitoring is complete is excessive and inconsistent with the two year standard requirement typically established by the resource agencies. SCE recommends a two year requirement.

Although some grassland/forbland habitat may be considered potentially suitable for Stephens' kangaroo rat, the habitat is not occupied by that species unless that species is present. If the habitat is not occupied, then the plant community is not sensitive nor does it support special status species (SKR). Requiring revegetation of this non-sensitive, predominantly ruderal plant community should not be required, unless the temporary loss is considered significant. Establishing performance standards and a 5-year monitoring requirement for a non-native grassland should not be required, as this vegetation rapidly becomes reestablished by itself following construction activities. SCE suggests replacing "suitable habitat" for SKR with "occupied habitat" for SKR.

For the reasons stated above, please make the following revisions:

**VEG-1d Restore or revegetate temporary disturbance areas.** [Supersedes APM BIO-1 to provide further specificity.] This measure has two parts: Part A and Part B. Part A is applicable to all temporary disturbance areas, and Part B is applicable to disturbance occurring in sensitive vegetation types and special-status species habitats.

For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall not be responsible for a one-time replacement. ~~If a second event occurs, a~~ No replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).

F3-150  
cont.

Comment Set F3: Southern California Edison Company (cont.)

**Part A: Habitat restoration and revegetation for all temporary disturbance areas.**

SCE shall prepare and implement a Habitat Restoration and Revegetation Plan (HRRP), to restore or revegetate all temporary disturbance areas, including temporary disturbance areas around tower construction sites, laydown or staging areas, temporary access and spur roads, cut and fill slopes, and locations of existing towers that are removed during construction of the project. For temporary disturbances in agriculture, developed/ disturbed, ~~and most grassland/forbland (excluding suitable occupied Stephens' kangaroo rat habitat and any areas with 10 percent or greater relative cover of native perennial grass species), and for temporary disturbance areas that are stabilized because they cannot be effectively revegetated,~~ the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion. The goals for sensitive vegetation and special-status species habitat are described in Part B of this Mitigation Measure.

The Draft HRRP shall be submitted to CPUC and BLM review and approval prior to the beginning of ground-disturbing activities. SCE shall incorporate all requested revisions in coordination with the CPUC and BLM and finalize the HRRP within 12 months from the start of construction.

For all temporary disturbance areas, the HRRP shall include the following elements:

- A statement of revegetation goals and objectives for each portion of the project area, based on vegetation type and jurisdictional status of each site.
- Quantitative success criteria for each revegetation or restoration site or category.
- Implementation details, including but not limited to topsoil stockpiling and handling; post-construction site preparation; soil decompaction and recontouring; planting and seeding palettes to include only native, locally sourced materials with confirmed availability from suppliers; fall-season planting or seeding dates.
- Maintenance, including but not limited to irrigation or hand-watering schedule and equipment, erosion control, and weed control.
- Monitoring and Reporting, specifying monitoring schedule and data collection methods throughout establishment of vegetation with key indicators of successful or unsuccessful progress, and quantitative values to objectively determine success or failure at the conclusion of the monitoring period.
- Contingency measures such as re-planting, drainage repairs, adjustments to irrigation or weeding schedule, and extension of maintenance beyond the original schedule, to repair or remediate sites not on track to meet success criteria, or not meeting the criteria at the close of the originally scheduled monitoring period.

The Integrated Weed Management Plan (Mitigation Measure VEG-2a) will be implemented throughout implementation of the HRRP. For all revegetation or restoration areas, only seed or potted nursery stock of locally occurring native species from a local source will be used for revegetation. Seeding and planting will be conducted as described in Chapter 5 of *Rehabilitation of Disturbed Lands in California* (Newton and Claassen, 2003). The list of plants observed during botanical surveys of the project area will be used as a guide to site-specific plant selection.

For all revegetation or restoration areas, the HRRP will include objective, quantifiable success criteria, commensurate with the goals for each site. Monitoring of the reclamation, revegetation, or restoration sites will continue annually for ~~no fewer than five (5) years or until the defined success criteria are achieved, whichever is later.~~ SCE will be responsible for implementing remediation measures as needed. ~~Following remediation work, each site will be subject to the success criteria and monitoring period as required for the initial reclamation, revegetation, or restoration.~~

**Part B: Additional habitat restoration and revegetation requirements for sensitive vegetation and special-status species habitat.**

For temporary disturbances in grassland/forbland that is either ~~suitable occupied Stephens' kangaroo rat habitat,~~ or has 10 percent or greater relative cover of native perennial grass species (see VEG-1c), and in all other ~~sensitive~~ vegetation types (alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, ~~desert scrub,~~ ~~and~~ riparian woodland, ~~and~~ ~~aeolian sand~~), the Habitat Restoration and Revegetation Plan will be designed to replace the habitat values ~~that were~~ present prior to disturbance (i.e., native plant species cover, habitat structure, and swell or substrate conditions). The following performance standards must be met by the end of the monitoring period:

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cont.



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

- Performance standards for absolute (total) cover by all vegetation types and for relative cover by native species will be established by the HRRP and will depend on pre-construction conditions (i.e., total coverage and relative native cover) in the specific communities being replaced in each area or based on the absolute and relative native coverage values identified within adjacent communities that contain the same vegetation type and on similar slope aspect of the vegetation being re-established.
- At least 80% of the vegetation cover within the restoration area shall be native species that naturally occur in local sensitive habitats;
- Absolute cover and density of native all plant species within the restoration areas shall equal at least 60-80 percent of the total cover by vegetation within pre-disturbance or reference vegetation cover; and
- Native plant species in the restoration areas shall contribute at least 70 percent of the relative cover contributed by native species within pre-disturbance or reference vegetation; and
- The site shall have persisted successfully without irrigation or remedial planting for a minimum of three two years prior to completion of monitoring.

For revegetation or restoration in these habitats, the HRRP will include (in addition to the components listed in Part A):

- A map depicting the locations of all temporary disturbance areas in these habitats, including a quantitative evaluation of native grass cover and occupied Stephens' kangaroo rat habitat suitability in all mapped grassland/forbland bland areas, subject to the requirements of Part B;
- An inventory of any temporary disturbance areas occupied by special-status species that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe (these will be categorized as "long-term disturbance areas," to be addressed under habitat compensation, Mitigation Measure VEG-1-e).

**Reporting (for Part A and Part B).** For all revegetation or restoration areas, SCE will provide annual reports to the CPUC and BLM verifying the total vegetation acreage subject to temporary and permanent disturbance, identifying which items of the HRRP have been completed, and which items are still outstanding. The annual reports will also include a summary of the reclamation, revegetation, or restoration activities for the year, a discussion of whether performance standards for the year were met, any remedial actions conducted and recommendations for remedial action, if warranted, that are planned for the upcoming year. Each annual report will be submitted within 90 days after completion of each year of revegetation and restoration work.

**Implementation locations:** Parts A and B of this mitigation measure shall apply as follows: San Bernardino County (all); WR MSHCP (within the WR MSHCP regardless of SCE's PSE status); CV MSHCP (within the CV MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands); mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's temporary habitat impacts will be restored, revegetated or stabilized according to the requirements of the MSHCP, and this mitigation measure will not apply within the applicable MSHCP area.

F3-150  
cont.



## Comment Set F3: Southern California Edison Company (cont.)

Page D.4-39 through 43

### DEIR/DEIS Text:

**VEG-1e Compensate for permanent habitat loss.** SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management. This compensation may be accomplished through participation in the WR-MSHCP or CV-MSHCP (within the respective MSHCP areas) if SCE obtains PSE status. This mitigation measure will be applicable to all permanent project disturbance areas and to areas designated as temporary disturbance, but that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe.

Habitat compensation for all permanent or long-term habitat loss that is not compensated through participation in the WR-MSHCP or CV-MSHCP will be accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions. SCE will prepare a Habitat Compensation Plan to be reviewed and approved by the CPUC, BLM, in consultation with the USFWS and CDFW.

SCE will acquire and protect, in perpetuity, compensation habitat to mitigate impacts to biological resources as detailed below. SCE shall be responsible for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands. The compensation lands will be placed under conservation management to be funded through the terms described herein.

The acreages of compensation land will be based upon final engineering calculation of impacted acreage for each resource and on ratios set forth in this measure, or in the USFWS Biological Opinion, the CDFW Streambed Alteration Agreement, the CDFW Incidental Take Permit, or the Consistency Determination, whichever presents a higher ratio. Acreages will be adjusted as appropriate for other alternatives or future modifications during implementation.

Compensation will be provided for impacts to the following resources, at the ratios specified below (acres acquired and preserved to acres impacted). These ratios reflect multiple bio-logical resource values, including habitat suitability for special-status species and wildlife movement or biological connectivity.

- Previously disturbed lands (agriculture, developed/disturbed) and open water: n/a (no habitat compensation required)
- Chaparral, desert scrub, and grassland/forbland: 1:1
- Alluvial scrub, coast live oak woodland, coastal sage scrub, riparian woodland, and aeolian sand: 3:1

The Habitat Compensation Plan will specify compensation acreage for each habitat type, based on final engineering and on MSHCP coverage as applicable. Final compensation requirements may be adjusted to account for any deviations in project disturbance, according to the as-built shapefiles ortho-rectified aerial imagery (Mitigation Measure VEG-1c).

**Compensation Land Selection Criteria.** Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands for impacts to biological resources will include all of the following:

- Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the project, taking into consideration soils, vegetation, topography, human-related disturbance, wildlife movement opportunity, proximity to other protected lands, management feasibility, and other habitat values, subject to review and approval by CPUC and BLM;
- To the extent that proposed compensation habitat may have been degraded by previous uses or activities, the site quality and nature of degradation must support the expectation that it will regenerate naturally when disturbances are removed;
- Be near larger blocks of lands that are already protected or planned for protection, or which could feasibly be protected long-term by a public resource agency or a non-governmental organization dedicated to habitat preservation;
- Not have a history of intensive recreational use or other disturbance that might cause future erosion or other habitat damage, and make habitat recovery and restoration infeasible;
- Not be characterized by high densities of invasive species, either on or immediately adjacent to the parcels under consideration, that might jeopardize habitat recovery and restoration;

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- Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat;
- Must provide wildlife movement value equal to that on the project site, based on topography, presence and nature of movement barriers or crossing points, location in relation to other habitat areas, management feasibility, and other habitat value; and
- Have water and mineral rights included as part of the acquisition, unless the CPUC and BLM, in consultation with CDFW and USFWS, agree in writing to the acceptability of land without these rights.

**Review and Approval of Compensation Lands Prior to Acquisition.** SCE shall submit a Draft Habitat Compensation Plan for review and approval by the CPUC and BLM describing the parcel(s) intended for protection. This Plan will discuss the suitability of the proposed parcel(s) as compensation lands in relation to the selection criteria listed above.

**Management Plan.** SCE or approved third party will prepare a management plan for the compensation lands in consultation with the entity that will be managing the lands. The goal of the management plan will be to support and enhance the long-term viability of the bio-logical resources. The Management Plan will be submitted for review and approval to the CPUC and BLM, in consultation with CDFW and USFWS.

**Compensation Lands Acquisition Requirements.** SCE will comply with the following requirements relating to acquisition of the compensation lands after the CPUC and BLM have approved the proposed compensation lands:

- **Preliminary Report.** SCE or an approved third party will provide a recent preliminary title report, initial hazardous materials survey report, biological resources analysis, and other necessary or requested documents for the proposed compensation land to the CPUC and BLM. All documents conveying or conserving compensation lands and all conditions of title are subject to review and approval by the CPUC in consultation with CDFW and USFWS. For conveyances to the State, approval may also be required from the California Department of General Services, the Fish and Game Commission, and the Wildlife Conservation Board.
- **Title/Conveyance.** SCE will acquire and transfer fee title to the compensation lands, a conservation easement over the lands, or both fee title and conservation easement, as required by the CPUC and BLM, in consultation with USFWS and CDFW. Any transfer of a conservation easement or fee title must be to CDFW, to a non-profit organization qualified to hold title to and manage compensation lands (pursuant to California Government Code section 6596S), or to BLM or other public agency approved by the CPUC and BLM. If an approved non-profit organization holds fee title to the compensation lands, a conservation easement will be recorded in favor of CDFW or another entity approved by the CPUC and BLM. If an entity other than CDFW holds a conservation easement over the compensation lands, the CPUC and BLM may require that CDFW or another entity approved by the CPUC and BLM, in consultation with CDFW and USFWS, be named a third party beneficiary of the conservation easement. SCE will obtain approval of the CPUC and BLM of the terms of any transfer of fee title or conservation easement to the compensation lands.
- **Initial Protection and Habitat Improvement.** SCE will fund activities that the CPUC and BLM may require for the initial protection and habitat improvement of the compensation lands. These activities will vary depending on the condition and location of the land acquired, but may include trash removal, construction and repair of fences, invasive plant removal, and similar measures to protect habitat and improve habitat quality on the compensation lands. A non-profit organization, CDFW, or another public agency may hold and expend the habitat improvement funds if it is qualified to manage the compensation lands (pursuant to California Government Code section 6596S), if it meets the approval of the CPUC and BLM, in consultation with USFWS and CDFW, and if it is authorized to participate in implementing the required activities on the compensation lands. If CDFW takes fee title to the compensation lands, the habitat improvement fund must be paid to CDFW or its designee.
- **Property Analysis Record.** Upon identification of the compensation lands, SCE will conduct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate amount of the long-term maintenance and management fund to pay the in-perpetuity management of the compensation lands. The PAR or PAR-like analysis must be approved by the CPUC and BLM, in consultation with USFWS and CDFW, before it can be used to establish funding levels or management activities for the compensation lands.
- **Long-term Maintenance and Management Funding.** SCE will provide funding to establish an account with non-wasting capital that will be used to fund the long-term maintenance and management of the compensation lands. The amount of money will be determined through an approved PAR or PAR-like analysis conducted for the compensation lands. SCE must obtain the BLM and Riverside County's approval of the entity that will receive and hold the long-term maintenance and management fund for the compensation lands. The CPUC and

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cont.

**Comment Set F3: Southern California Edison Company (cont.)**

BLM will consult with USFWS and CDFW before deciding whether to approve an entity to hold the project's long-term maintenance and management funds.

SCE will ensure that an agreement is in place with the long-term maintenance and management fund holder/manager to ensure the following requirements are met:

- **Interest.** Interest generated from the initial capital long-term maintenance and management fund will be available for reinvestment into the principal and for the long-term operation, management, and protection of the approved compensation lands, including reasonable administrative overhead, biological monitoring, habitat improvements, patrol and law enforcement activities, and any other action that is approved by the CPUC and BLM and is designed to protect or improve the habitat values of the compensation lands.
- **Withdrawal of Principal.** The long-term maintenance and management fund principal will not be drawn upon unless such withdrawal is deemed necessary by the CPUC and BLM, or by the approved third-party long-term maintenance and management fund manager, to ensure the continued viability of the species on the compensation lands.
- **Pooling Long-Term Maintenance and Management Funds.** An entity approved to hold long-term maintenance and management funds for the project may pool those funds with similar non-wasting funds that it holds from other projects for long-term maintenance and management of compensation lands. However, for reporting purposes, the long-term maintenance and management funds for this project must be tracked and reported individually to the CPUC and BLM.
- **Other Expenses.** In addition to the costs listed above, SCE will be responsible for all other costs related to acquisition of compensation lands and conservation easements, including but not limited to the title and document review costs incurred from other state agency reviews, overhead related to providing compensation lands to CDFW or an approved third party, escrow fees or costs, environmental contaminants clearance, and other site cleanup measures.
- **Delegation.** The responsibility for acquisition of compensation lands may be delegated to a third party, by written agreement of the CPUC and BLM, in consultation with CDFW, prior to land acquisition, enhancement or management activities.

**Implementation Locations:** This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's permanent habitat impacts will be compensated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.

**SCE Comment:**

Edits to VEG-1e are proposed for the following reasons:

**Paragraph 1:**

Inserted "approved in-lieu-fee compensatory mitigation bank" to clarify the option to use mitigation banks.

**Paragraph 4:**

The resource agencies are responsible for oversight on compensatory mitigation to special-status species. As such, special-status species habitat specific mitigation ratios as specified in the permit conditions, should supersede the ratios in VEG-1e. Ratios applied may vary based on the functions and values of disturbed habitat vs. the functions and values of the replacement habitat which should be taken into consideration and the ratios specified in VEG-1e should not be absolute.

**Paragraph 5, Compensation Ratios:**

Aeolian sand is not designated as a state sensitive natural community and is recommended to be deleted, as with chaparral, desert scrub and grassland/forbland, which are common communities along the project route and are not considered to be of special concern (ranked S-1 to S-3) by the. If the intent is to compensate for special-status species habitat, only habitat known to support them should require compensation, which would be required in the applicable resource agency permit condition.

As stated in *Impact WIL-4: Project activities and facilities could cause adverse effects to habitat linkages or wildlife movement corridors*, "...the Proposed Project would not cause increased barriers or hindrances to wildlife

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cont.

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

*movement, no mitigation is recommended.*" As such, compensation ratios should not be based on wildlife movement or biological connectivity, because the transmission line does not block wildlife movement.

In addition, coastal sage scrub habitat along the project is generally patchy and its function and value as California gnatcatcher habitat is reduced, as evidenced by the negative survey results in 2012, 2013, and most recently in 2015. A 1:1 ratio is suggested for Coastal sage scrub, subject to revision based on subsequent permit conditions.

#### Paragraphs 10-32:

The information described in these paragraphs are typical requirements of compensatory mitigation included in resource agency permit conditions. The level of detail included this mitigation measure may lead to inconsistencies in requirements. It is recommended that this level of detail be removed from this mitigation measure to prevent future conflicts with subsequent permit conditions. A Habitat Compensation Plan will be prepared to comply with permit conditions which will include the details similar to the list below.

#### Suggested Revisions:

**VEG-1e Compensate for permanent habitat loss.** SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management, or through participation in an approved in-lieu-fee compensatory mitigation bank. This compensation may be accomplished through participation in the WR-MSHCP, CV-MSHCP (within the respective MSHCP areas) if SCE obtains PSE status. This mitigation measure will be applicable to all permanent project disturbance and to areas designated as temporary disturbance, but that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe.

Habitat compensation for all permanent or long-term habitat loss that is not compensated through participation in the WR-MSHCP or CV-MSHCP will be accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions. SCE will prepare a Habitat Compensation Plan to be reviewed and approved by the CPUC, BLM, in consultation with the USFWS and CDFW.

SCE will acquire and protect, in perpetuity, compensation habitat to mitigate impacts to sensitive bio-logical resources as detailed below. SCE shall be responsible for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands. The compensation lands will be placed under conservation management to be funded through the terms described herein.

The acreages of compensation land will be based upon final engineering calculation of impacted acreage for each resource and on ratios set forth in this measure, or will be superseded with the ratios in the USFWS Biological Opinion, the CDFW Streambed Alteration Agreement, the CDFW Incidental Take Permit, or the Consistency Determination, ~~which ever presents a higher ratio~~. Acreages will be adjusted as appropriate for other alternatives or future modifications during implementation.

Compensation will be provided for impacts to the following resources, at the ratios specified below (acres acquired and preserved to acres impacted). These ratios reflect multiple bio-logical resource values, including habitat suitability for special-status species, ~~and wildlife movement or biological connectivity~~.

- Previously disturbed lands (agriculture, developed/disturbed) and open water; n/a (no habitat compensation required)
- ~~Chaparral, desert scrub, and grassland/forbland~~ Coastal sage scrub: 1:1
- Alluvial scrub, coast live oak woodland, ~~coastal sage scrub, and~~ riparian wetland, ~~and~~ aeolian sand: 3:1

The Habitat Compensation Plan will specify compensation acreage for each habitat type, based on final engineering and on MSHCP coverage as applicable. Final compensation requirements may be adjusted to account for any deviations in project disturbance, according to the as-built shapefiles ortho-rectified aerial imagery (Mitigation Measure VEG-1c).

**Compensation Land Selection Criteria.** Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands for impacts to biological resources will include all of the following:

- Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the project, taking into consideration soils, vegetation, topography, human-related

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cont.

### Comment Set F3: Southern California Edison Company (cont.)

- disturbance, wildlife movement opportunity, proximity to other protected lands, management feasibility, and other habitat values, subject to review and approval by CPUC and BLM;
- To the extent that proposed compensation habitat may have been degraded by previous uses or activities, the site quality and nature of degradation must support the expectation that it will regenerate naturally when disturbances are removed;
- Be near larger blocks of lands that are either already protected or planned for protection, or which could feasibly be protected long term by a public resource agency or a non-governmental organization dedicated to habitat preservation;
- Not have a history of intensive recreational use or other disturbance that might cause future erosion or other habitat damage, and make habitat recovery and restoration infeasible;
- Not be characterized by high densities of invasive species, either on or immediately adjacent to the parcels under consideration, that might jeopardize habitat recovery and restoration;
- Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat;
- Must provide wildlife movement value equal to that on the project site, based on topography, presence and nature of movement barriers or crossing points, location in relation to other habitat areas, management feasibility, and other habitat values; and
- Have water and mineral rights included as part of the acquisition, unless the CPUC and BLM, in consultation with CDFW and USFWS, agree in writing to the acceptability of land without these rights.

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- **Title/Conveyance.** SCE will acquire and transfer fee title to the compensation lands, a conservation easement over the lands, or both fee title and conservation easement, as required by the CPUC and BLM, in consultation with USFWS and CDFW. Any transfer of a conservation easement or fee title must be to CDFW, to a non-profit organization qualified to hold title to and manage compensation lands (pursuant to California Government Code section 65965), or to BLM or other public agency approved by the CPUC and BLM. If an approved non-profit organization holds fee title to the compensation lands, a conservation easement will be recorded in favor of CDFW or another entity approved by the CPUC and BLM. If an entity other than CDFW holds a conservation easement over the compensation lands, the CPUC and BLM may require that CDFW or another entity approved by the CPUC and BLM, in consultation with CDFW and USFWS, be named a third party beneficiary of the conservation easement. SCE will obtain approval of the CPUC and BLM of the terms of any transfer of fee title or conservation easement to the compensation lands.
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habitat improvement funds if it is qualified to manage the compensation lands (pursuant to California Government Code section 65965), if it meets the approval of the CPUC and BLM, in consultation with USFWS and CDFW, and if it is authorized to participate in implementing the required activities on the compensation lands. If CDFW takes fee title to the compensation lands, the habitat improvement fund must be paid to CDFW or its designee.

- **Property Analysis Record.** Upon identification of the compensation lands, SCE will conduct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate amount of the long-term maintenance and management fund to pay the in-perpetuity management of the compensation lands. The PAR or PAR-like analysis must be approved by the CPUC and BLM, in consultation with USFWS and CDFW, before it can be used to establish funding levels or management activities for the compensation lands.
- **Long-Term Maintenance and Management Funding.** SCE will provide funding to establish an account with non-wasting capital that will be used to fund the long-term maintenance and management of the compensation lands. The amount of money will be determined through an approved PAR or PAR-like analysis conducted for the compensation lands. SCE must obtain the BLM and Riverside County's approval of the entity that will receive and hold the long-term maintenance and management fund for the compensation lands. The CPUC and BLM will consult with USFWS and CDFW before deciding whether to approve an entity to hold the project's long-term maintenance and management funds.

SCE will ensure that an agreement is in place with the long-term maintenance and management fund holder/manager to ensure the following requirements are met:

- **Interest.** Interest generated from the initial capital long-term maintenance and management fund will be available for reinvestment into the principal and for the long-term operation, management, and protection of the approved compensation lands, including reasonable administrative overhead, biological monitoring, habitat improvements, patrol and law enforcement activities, and any other action that is approved by the CPUC and BLM and is designed to protect or improve the habitat values of the compensation lands.
- **Withdrawal of Principal.** The long-term maintenance and management fund principal will not be drawn upon unless such withdrawal is deemed necessary by the CPUC and BLM, or by the approved third-party long-term maintenance and management fund manager, to ensure the continued viability of the species on the compensation lands.
- **Pooling Long-Term Maintenance and Management Funds.** An entity approved to hold long-term maintenance and management funds for the project may pool those funds with similar non-wasting funds that it holds from other projects for long-term maintenance and management of compensation lands. However, for reporting purposes, the long-term maintenance and management funds for this project must be tracked and reported individually to the CPUC and BLM.
- **Other Expenses.** In addition to the costs listed above, SCE will be responsible for all other costs related to acquisition of compensation lands and conservation easements, including but not limited to the title and document review costs incurred from other state agency reviews, overhead related to providing compensation lands to CDFW or an approved third party, escrow fees or costs, environmental contaminants clearance, and other site cleanup measures.
- **Delegation.** The responsibility for acquisition of compensation lands may be delegated to a third party, by written agreement of the CPUC and BLM, in consultation with CDFW, prior to land acquisition, enhancement or management activities.

**Implementation Locations:** This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's permanent habitat impacts will be compensated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.

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cont.

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DEIR/DEIS Text:

**Surface water flow.** Project activities could interrupt localized surface hydrology. For example, berms or channel crossings could impound stormwater runoff and sediment on the upstream sides. This impoundment could affect native vegetation and habitat by inundating, burying, or covering it in sediment. In addition, interruption, impoundment, or redirection of natural flows (including infrequent storm flows) could cause substantial erosion to downstream soils where flow is redirected, and prevent water and sediment from reaching downstream vegetation and habitat. This effect could reduce vegetation productivity and related wildlife habitat values (food, shade, and shelter) and reduce availability of silt and sand as habitat substrate for plants and wildlife downstream. Upstream inundation and downstream erosion also could eliminate vegetation and habitat for wildlife, including special-status species, by killing or uprooting plants and eroding or burying burrows. These effects may be limited to the Proposed Project's construction and or restoration phases, if surface contours and soil stability are returned to pre-disturbance conditions during restoration. Alternately, these effects could persist throughout the O&M phase if they are caused by permanent structures (such as impoundments at road crossings).

SCE would implement APM HYDRO-1 through APM HYDRO-3 (see Table B-18) to minimize alteration of surface flows. Under these APMs, drainage improvements (e.g., channel crossings and downslope road drainageways) would be designed to maintain existing flow patterns; soil disturbance would be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures; and erosion control plans would be incorporated into the construction bidding specifications to ensure compliance by SCE's contractor. APMs HYDRO-2 and HYDRO-3 are superseded by Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits). Mitigation Measure WR-2a would minimize or mitigate the effects of surface hydrology alterations. These measures include mulching, physical stabilization, dust suppression, berms, ditches, and sediment barriers, and ensure proper compliance with Storm Water Pollution Prevention Plan (SWPPP) requirements and Best Management Practices (BMPs).

SCE Comment:

Please make the following revision:

**Surface water flow.** Project activities could interrupt localized surface hydrology. For example, berms or channel crossings could impound stormwater runoff and sediment on the upstream sides. This impoundment could affect native vegetation and habitat by inundating, burying, or covering it in sediment. In addition, interruption, impoundment, or redirection of natural flows (including infrequent storm flows) could cause substantial erosion to downstream soils where flow is redirected, and prevent water and sediment from reaching downstream vegetation and habitat. This effect could reduce vegetation productivity and related wildlife habitat values (food, shade, and shelter) and reduce availability of silt and sand as habitat substrate for plants and wildlife downstream. Upstream inundation and downstream erosion also could eliminate vegetation and habitat for wildlife, including special-status species, by killing or uprooting plants and eroding or burying burrows. These effects may be limited to the Proposed Project's construction and or restoration phases, if surface contours and soil stability are returned to pre-disturbance conditions during restoration. Alternately, these effects could persist throughout the O&M phase if they are caused by permanent structures (such as impoundments at road crossings); however, the increased effects would be similar to the existing baseline conditions caused by existing O&M on the existing WOD ROW.

SCE would implement APM HYDRO-1 through APM HYDRO-3 (see Table B-18) to minimize alteration of surface flows. Under these APMs, drainage improvements (e.g., channel crossings and downslope road drainageways) would be designed to maintain existing flow patterns; soil disturbance would be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures; and erosion control plans would be incorporated into the construction bidding specifications to ensure compliance by SCE's contractor. APMs HYDRO-2 and HYDRO-3 are superseded by Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits). Mitigation Measure WR-2a would minimize or mitigate the effects of surface hydrology alterations. These measures include mulching, physical stabilization, dust suppression, berms, ditches, and sediment barriers, and ensure proper compliance with Storm Water Pollution Prevention Plan (SWPPP) requirements and Best Management Practices (BMPs).

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## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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### DEIR/DEIS Text:

**VEG-2a Prepare and implement an Integrated Weed Management Plan.** SCE shall prepare and implement an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.

For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, restoration, and O&M. The IWMP will include the information defined in the following paragraphs.

### SCE Comment:

As acknowledged in this impact assessment, the project ROW is already heavily infested with weeds. After the IWMP has been fully implemented (and the post-construction restoration period is complete), SCE should not be obligated to monitor and survey during the O&M of the line.

Please make the following revisions:

**VEG-2a Prepare and implement an Integrated Weed Management Plan.** SCE shall prepare and implement an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.

For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, and restoration, and O&M. The IWMP will include the information defined in the following paragraphs.

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### Comment Set F3: Southern California Edison Company (cont.)

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#### DEIR/DEIS Text:

**Monitoring.** The IWMP shall specify methods to survey for weeds during construction, restoration, and O&M; and shall specify qualifications of botanists responsible for weed monitoring and identification. It must include a monitoring schedule to ensure timely detection and immediate control of weed infestations to prevent further spread. Surveying and monitoring for weed infestations shall occur at least two times per year, to coincide with the early detection period for early season and late season weeds (i.e., species germinating in winter and flowering in late winter or spring, and species germinating later in the season and flowering in summer or fall). It also must include methods for marking invasive weeds on the ROW, and recording and communicating these locations to weed control staff. The map of weed locations (discussed above) shall be updated at least once a year. The monitoring section shall also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.

#### SCE Comment:

After the IWMP has been fully implemented (and the post-construction restoration period is complete), SCE should not be obligated to monitor and survey during the O&M of the line.

Please make the following revisions:

**Monitoring.** The IWMP shall specify methods to survey for weeds during construction and restoration; restoration, and O&M; and shall specify qualifications of botanists responsible for weed monitoring and identification. It must include a monitoring schedule to ensure timely detection and immediate control of weed infestations to prevent further spread. Surveying and monitoring for weed infestations shall occur at least two times per year, to coincide with the early detection period for early season and late season weeds (i.e., species germinating in winter and flowering in late winter or spring, and species germinating later in the season and flowering in summer or fall). It also must include methods for marking invasive weeds on the ROW, and recording and communicating these locations to weed control staff. The map of weed locations (discussed above) shall be updated at least once a year. The monitoring section shall also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.

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## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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### DEIR/DEIS Text:

**VEG-2a Prepare and implement an Integrated Weed Management Plan.** SCE shall prepare and implement an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved. For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, restoration, and O&M. The IWMP will include the information defined in the following paragraphs.

**Background.** An assessment of the Proposed Project's potential to cause spread of invasive non-native weeds into new areas, or to introduce new non-native invasive weeds into the ROW. This section must list known and potential non-native and invasive weeds occurring on the ROW and in the project region, and identify threat rankings and potential consequences of project-related occurrence or spread for each species. This assessment will include, but is not limited to, weeds that (1) are rated high or moderate for negative ecological impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006), and (2) aid and promote the spread of wildfires (such as cheatgrass, Saharan mustard, and medusa head). This section will identify control goals for each species (e.g., eradication, suppression, or containment) likely to be found within the Proposed Project area.

**Pre-construction weed inventory.** SCE shall inventory the entire ROW, including all areas subject to ground-disturbing activity, including, but not limited to, tower pad preparation and construction areas, tower removal sites, pulling and tensioning sites, assembly yards, and any potential new or improved access and spur roads. Weed occurrences shall be mapped and described according to density and area covered. The map will be updated at least once a year.

### SCE Comment:

Requiring an inventory of weeds over the entire ROW should not be necessary because substantial areas within the ROW will not be affected. Conversely, there are many areas outside the ROW that will be affected and should be included in the weed inventory effort. It should be sufficient to repeatedly survey the areas in and immediately adjacent to project areas subject to ground disturbing activities.

### Suggested Revision:

**VEG-2a Prepare and implement an Integrated Weed Management Plan.** SCE shall prepare and implement an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.

For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, ~~and~~ restoration, ~~and~~ O&M. The IWMP will include the information defined in the following paragraphs.

**Background.** An assessment of the Proposed Project's potential to cause spread of invasive non-native weeds into new areas, or to introduce new non-native invasive weeds into the ROW. This section must list known and potential non-native and invasive weeds occurring on the ROW and in the project region, and identify threat rankings and potential consequences of project-related occurrence or spread for each species. This assessment will include, but is not limited to, weeds that (1) are rated high or moderate for negative ecological impact in the

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**Comment Set F3: Southern California Edison Company (cont.)**

California Invasive Plant Inventory Database (Cal-IPC, 2006), and (2) aid and promote the spread of wildfires (such as cheatgrass, Saharan mustard, and medusa head). This section will identify control goals for each species (e.g., eradication, suppression, or containment) likely to be found within the Proposed Project area.

**Pre-construction weed inventory.** SCE shall inventory the entire ROW, including all areas subject to ground-disturbing activity, including, but not limited to, tower pad preparation and construction areas, tower removal sites, pulling and tensioning sites, assembly yards, and any potential new or improved access and spur roads. Weed occurrences shall be mapped and described according to density and area covered. The map will be updated at least once a year.

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cont.**

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### DEIR/DEIS Text:

**Prevention.** The IWMP will specify methods to minimize potential transport of weed seeds onto the ROW, or from one section of the ROW to another. The ROW may be divided into "weed zones," based on known or likely invasive weeds in any portion of the ROW. The IWMP will specify inspection procedures for construction materials and equipment entering the Proposed Project area. Vehicles and equipment may be inspected and cleaned at entry points to specified portions of the ROW, and before leaving work sites where weed occurrences must be contained locally. Construction equipment shall be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Equipment shall be inspected to ensure it is free of any dirt or mud that could contain weed seeds, and the tracks, outriggers, tires, and undercarriage will be carefully washed, with special attention being paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g., pick-up trucks) that will be frequently entering and exiting the site will be inspected and washed on an as-needed basis. Tools such as chainsaws, hand clippers, pruners, etc., shall be cleaned of dirt and mud before entering project work areas.

All vehicles will be washed off-site when possible. If off-site washing is infeasible, on-site cleaning stations will be set up at specified locations to clean equipment before it enters the work area. Wash stations will be located away from native habitat or special-status species occurrences. Wastewater from cleaning stations will not be allowed to run off the cleaning station site. When vehicles and equipment are washed, a daily log must be kept stating the location, date and time, types of equipment, methods used, and personnel present. The log shall contain the signature of the responsible crewmember. Written or electronic logs shall be available to BLM and CPUC monitors on request.

### SCE Comment:

The requirements stipulating that vehicles and equipment "may" be inspected or "shall" be cleaned of dirt and mud that could contain weed seeds will be cumbersome to implement and may be ineffective. Requirements involving setting up "on-site cleaning stations" will be difficult or highly impractical to implement and requiring inspections and logs to be kept that all vehicles are checked will be very cumbersome and involve substantial cost to maintain inspectors at numerous entry points.

In recognition of the facts that 1) the entire project area is heavily infested with many weed species, some of which all parties recognize it is beyond the scope of the project to manage, and 2) SCE will implement a program to control weeds whenever they appear in areas where they have not previously occurred, it would be highly preferable not to try to put wash stations at multiple locations or try to inspect vehicles at numerous entry points but rather to require the following standard protocol to be adhered to:

Vehicles and equipment traveling between weed zones will require washing at commercial car washes.

The following revisions are suggested:

**Prevention.** The IWMP will specify methods that vehicles and equipment traveling between weed zones will require washing at commercial car washes to minimize potential transport of weed seeds onto the ROW, or from one section of the ROW to another. The ROW may be divided into "weed zones," based on known or likely invasive weeds in any portion of the ROW. The IWMP will specify inspection procedures for construction materials and equipment entering the Proposed Project area. ~~Vehicles and equipment may be inspected and cleaned at entry points to specified portions of the ROW, and before leaving work sites where weed occurrences must be contained locally.~~ Construction equipment shall be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Equipment shall be inspected to ensure it is free of any dirt or mud that could contain weed seeds, and the tracks, outriggers, tires, and undercarriage will be carefully washed, with special attention being paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g., pick-up trucks) that will be frequently entering and exiting the site will be inspected and washed on an as-needed basis. Tools such as chainsaws, hand clippers, pruners, etc., shall be cleaned of dirt and mud before entering project work areas.

All vehicles will be washed off-site, when possible. If off-site washing is infeasible, on-site cleaning stations will be set up at specified locations to clean equipment before it enters the work area. Wash stations will be located

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**Comment Set F3: Southern California Edison Company (cont.)**

away from native habitat or special status species occurrences. Wastewater from cleaning stations will not be allowed to run off the cleaning station site. When vehicles and equipment are washed, a daily log must be kept stating the location, date and time, types of equipment, methods used, and personnel present. The log shall contain the signature of the responsible crewmember. Written or electronic logs shall be available to BLM and CPUC monitors on request.

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cont.

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page D.4-48

##### DEIR/DEIS Text:

Weed infestations will be treated at a minimum of once annually until eradication, suppression, or containment goals are met. For eradication, when no new seedlings or resprouts are observed for three consecutive, normal rainfall years, the weed occurrence can be considered eradicated and weed control efforts may cease for the site.

##### SCE Comment:

Because the entire project area is heavily infested with many weed species (some of which are unmanageable), SCE will implement a program to control weeds whenever they appear in areas where they have not previously occurred, and the project area is experiencing a long period of drought, SCE recommends the following revisions: Weed infestations will be treated at a minimum of once annually until eradication, suppression, or containment goals are met per the IWMP. ~~For eradication, when no new seedlings or resprouts are observed, for three consecutive normal rainfall years, the weed occurrence can be considered eradicated and weed control efforts may cease for the site.~~

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##### DEIR/DEIS Text:

Potential impacts to jurisdictional drainages would be reduced through implementation of a Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) as described in Section 4.9 of the PEA (see page 4.9-21), and compliance with the conditions set forth in State and federal permits or authorizations (California Fish & Game Code Sections 1600-1616 and CWA Sections 401 and 404). In addition, Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would further minimize or mitigate the effects of surface hydrology alterations. Mitigation Measure VEG-1d would require revegetation or restoration of temporarily disturbed areas, including drainage features. Mitigation Measure VEG-1e would require compensation for permanent habitat loss, including drainage features. And Mitigation Measure VEG-3a would require restoration or compensation to achieve no net loss of wetland and watercourse habitat values. Taken together, these measures would effectively avoid or mitigate the Proposed Project's adverse impacts to biological resources within jurisdictional waters.

##### SCE Comment:

There should be no need to prepare an Erosion Control Plan (ECP) if a Storm Water Pollution Prevention Plan (SWPPP) is to be prepared and implemented. Please make the following revision:

Potential impacts to jurisdictional drainages would be reduced through implementation of a Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) as described in Section 4.9 of the PEA (see page 4.9-21), and compliance with the conditions set forth in State and federal permits or authorizations (California Fish & Game Code Sections 1600-1616 and CWA Sections 401 and 404). ~~In addition, Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would further minimize or mitigate the effects of surface hydrology alterations.~~ Mitigation Measure VEG-1d would require revegetation or restoration of temporarily disturbed areas, including drainage features. Mitigation Measure VEG-1e would require compensation for permanent habitat loss, including drainage features. And Mitigation Measure VEG-3a would require restoration or compensation to achieve no net loss of wetland and watercourse habitat values. Taken together, these measures would effectively avoid or mitigate the Proposed Project's adverse impacts to biological resources within jurisdictional waters.

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Comment Set F3: Southern California Edison Company (cont.)

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DEIR/DEIS Text:

**No net wetlands loss and watercourse impacts minimization.** SCE shall prepare an HMMP which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. The no net loss standard shall be reached through (1) ecological restoration of temporarily disturbed areas to fully replace habitat extent and habitat value, and (2) compensation at a ratio of 1:1 to replace permanently impacted non-wetland jurisdictional areas, and at 3:1 to replace permanently impacted state or federally jurisdictional wetland areas. Restoration and compensation mitigation for impacts to jurisdictional waters shall conform to the requirements of Mitigation Measures VEG-1d (Restore or revegetate temporary disturbance areas) and VEG-1e (Compensate for permanent habitat loss). All wetlands and water-courses, whether intermittent or perennial, will be retained to the extent feasible, and appropriate setbacks or other means will be employed to prevent adverse impacts to surface waters or associated habitat values. The HMMP shall be subject to review and approval by the CPUC and BLM. All restoration or compensation mitigation described in the HMMP shall be implemented in full.

SCE Comment:

The mitigation measure should defer to the HMMP and the applicable permit for wetland mitigation requirements. is the mitigation ratio should be modified to reflect a typical ratio for non-wetland jurisdictional areas. .

Please make the following revision:

**No net wetlands loss and watercourse impacts minimization.** SCE shall prepare an HMMP which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. The no net loss standard shall be reached through (1) ecological restoration or revegetation of temporarily disturbed areas to fully replace habitat extent and habitat value, and (2) compensation at a ratio of 1:1 to replace permanently impacted non-wetland jurisdictional areas, and at 3:1 to replace permanently impacted state or federally jurisdictional wetland areas at a mitigation ratio determined by the wetland/water permitting agencies during the 401/404 and 1602 permitting process. Restoration and compensation mitigation for impacts to jurisdictional waters shall conform to the requirements of Mitigation Measures VEG-1d (Restore or revegetate temporary disturbance areas) and VEG-1e (Compensate for permanent habitat loss). All wetlands and water-courses, whether intermittent or perennial, will be retained to the extent feasible, and appropriate setbacks or other means will be employed to prevent adverse impacts to surface waters or associated habitat values. The HMMP will incorporate permit requirements and shall be subject to review and approval by the CPUC and BLM. All restoration or compensation mitigation described in the HMMP shall be implemented in full. This mitigation measure will be superseded by the requirements of water permits.

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DEIR/DEIS Text:

SCE shall conduct focused surveys for federal- and state-listed and other special-status plants. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 ranked species) impacted by project activities shall be documented in pre-construction survey reports.

SCE Comment:

Some species can already be determined as absent and SCE should not have to continue to survey for absent shrubs. Please make the following revision: SCE shall conduct focused surveys for federal- and state-listed and other special-status plants, except for species already determined to be absent. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 ranked species) impacted by project activities shall be documented in pre-construction survey reports.

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Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-53

DEIR/DEIS Text:

Preconstruction Survey. (Second Paragraph)

If federally listed plants would be affected, SCE shall notify BLM and USFWS to review obtain the appropriate permits from CDFW and USFWS and comply with permit requirements. Additional conservation measures to protect or restore listed plant species or their habitat may be required by BLM, CDFW, or USFWS before impacts are authorized.

SCE Comment:

Please make the following revision:

If state or federally listed plants would be affected, SCE shall notify CDFW BLM and USFWS to review obtain the appropriate permits ~~from CDFW and USFWS~~ and comply with permit requirements. Additional conservation measures to protect or restore listed plant species or their habitat may be required by BLM, CDFW, or USFWS before impacts are authorized.

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Page D.4-53 through 54

DEIR/DEIS Text:

**Native cactus and Yucca.** Most native cactus and shrubby *Yucca* species (Joshua tree and Mohave yucca) can be successfully salvaged and transplanted, and yuccas often provide an important vertical component to wildlife habitat. Therefore, native cactus (excluding chollas in the genus *Cylindropuntia*) and yuccas (excluding chaparral yucca, *Y. whipplei*), shall be avoided or salvaged according to the strategies described below.

SCE Comment:

The regulatory basis for this measure is not clear in the DEIR/DEIS. Avoidance can be done to the extent possible; however, barrel cactus (and other non-*Cylindropuntia* cacti) are prevalent in the eastern portions of the Proposed Project in numbers that may prove infeasible for translocation. The linear nature of the project would also allow wildlife to continue to use adjacent vertical vegetation components reducing the significance of removal of these types of plants to construct the project.

Without a regulatory basis or significant impact under CEQA/NEPA, removal of this discussion is requested.

~~**Native cactus and Yucca.** Most native cactus and shrubby *Yucca* species (Joshua tree and Mohave yucca) can be successfully salvaged and transplanted, and yuccas often provide an important vertical component to wildlife habitat. Therefore, native cactus (excluding chollas in the genus *Cylindropuntia*) and yuccas (excluding chaparral yucca, *Y. whipplei*), shall be avoided or salvaged according to the strategies described below.~~

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## Comment Set F3: Southern California Edison Company (cont.)

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### DEIR/DEIS Text:

#### Avoidance. (Last Sentence of Section)

At minimum, the buffer for trees or shrubs species shall be equal to twice the drip line (i.e., two times the distance from the trunk to the canopy edge) to protect and preserve the root systems. The buffer for herbaceous species shall be a minimum of 50 feet from the perimeter of the occupied habitat or the individual. If a smaller buffer is necessary due to other project constraints, SCE will develop and implement site-specific monitoring and put other measures in place to avoid the take of the species, with the approval of the CPUC and BLM, in consultation with USFWS and CDFW.

#### SCE Comment:

The requirement for an avoidance buffer for trees to be twice the distance of the drip line is excessive, particularly for non-listed species. Typically the avoidance buffer is out to the edge of the dripline.

Please make the following revisions:

At minimum, the buffer for trees or shrubs species shall be equal to ~~twice~~ the drip line (i.e., ~~two times the distance~~ from the trunk to the canopy edge) to protect and preserve the root systems. The buffer for herbaceous species shall be a minimum of ~~50~~ 10 feet from the perimeter of the occupied habitat or the individual. If a smaller buffer is necessary due to other project constraints, SCE will ~~develop and implement~~ site-specific monitoring and put other measures in place to avoid the take of the species, with the approval of the CPUC and BLM, in consultation with USFWS and CDFW.

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### DEIR/DEIS Text:

**Off-site compensation.** SCE shall provide compensation lands consisting of habitat occupied by the impacted CRPR 1 or 2 ranked plants at a 1:1 ratio of acreage and number of plants for any occupied habitat affected by the project. Occupied habitat will be calculated on the project site and on the compensation lands as including each special status plant occurrence and a surrounding 100-foot buffer area. Off-site compensation shall be incorporated into the project's Habitat Compensation Plan (under Mitigation Measure VEG-1e), for review and approval by the CPUC and BLM in consultation with CDFW and USFWS.

#### SCE Comment:

The measure as currently written would be very difficult to implement. The count for individuals should be restricted to herbs, shrubs and trees or a density/acre count, depending on species. For example, it would be difficult to count the number of individual grasses, especially as growth patterns may not allow for individual counts.

In addition, SCE should not have to categorically mitigate for a 100-foot buffer around each population because the buffer may not include suitable soils/habitat for the species.

SCE recommends translocation, seed collection and re-seeding, or other onsite mitigation options as an alternative to off-site compensation for special status plants as described in APM Bio-7.

(This measure is for SB County, BLM and Morongo only.)

For the reasons stated above, please make the following revision:

**Off-site compensation.** SCE shall provide compensation lands consisting of habitat occupied by the impacted CRPR 1 or 2 ranked plants at a 1:1 ratio of acreage and number of plants for any occupied habitat affected by the project. Occupied habitat will be calculated on the project site and on the compensation lands as including each special status plant occurrence and a surrounding 100-foot buffer area. Off-site compensation shall be incorporated into the project's Habitat Compensation Plan (under Mitigation Measure VEG-1e), for review and approval by the CPUC and BLM in consultation with CDFW and USFWS.

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**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.4-54**

**DEIR/DEIS Text:**

**Salvage.** SCE shall consult with horticulturists at a qualified institution such as Rancho Santa Ana Botanic Garden (RSABG) regarding the feasibility and likely success of salvage efforts for each species.

**SCE Comment:**

There are other qualified specialists SCE can consult other than horticulturalists at qualified institutions. Please make the following revision:

**Salvage.** SCE shall consult with a qualified restoration ecologist or a horticulturists at a qualified institution such as Rancho Santa Ana Botanic Garden (RSABG) regarding the feasibility and likely success of salvage efforts for each species.

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**Page D.4-55**

**DEIR/DEIS Text:**

For cacti and yuccas, the goal shall be maximum practicable survivorship of salvaged plants. The Plan will include at minimum: (a) species and locations of plants identified for salvage; (b) criteria for determining whether an individual plant is appropriate for salvage; (c) the appropriate season for salvage; (d) equipment and methods for collection, transport, and re-planting plants or seed banks, to retain intact soil conditions and maximize success; (e) for shrubs, cacti, and yucca, a requirement to mark each plant to identify the north-facing side prior to transport, and replant it in the same orientation; (f) details regarding storage of plants or seed banks for each species; (g) location of the proposed recipient site, and detailed site preparation and plant introduction techniques for top soil storage, as applicable; (h) a description of the irrigation, weed control, and other maintenance activities; (i) success criteria, including specific timeframe for survivorship and reproduction of each species; and (j) a detailed monitoring program, commensurate with the Plan's goals.

**SCE Comment:**

See comment to "Native cactus and Yucca" section on Page D.5-53, above. The regulatory need for this mitigation is not clear in the DEIR/DEIS and deleting the requirement to salvage cacti and yucca is recommended, unless they are special-status species:

~~For cacti and yuccas, the goal shall be maximum practicable survivorship of salvaged plants. The Plan will include at minimum: (a) species and locations of plants identified for salvage; (b) criteria for determining whether an individual plant is appropriate for salvage; (c) the appropriate season for salvage; (d) equipment and methods for collection, transport, and re-planting plants or seed banks, to retain intact soil conditions and maximize success; (e) for shrubs, cacti, and yucca, a requirement to mark each plant to identify the north-facing side prior to transport, and replant it in the same orientation; (f) details regarding storage of plants or seed banks for each species; (g) location of the proposed recipient site, and detailed site preparation and plant introduction techniques for top soil storage, as applicable; (h) a description of the irrigation, weed control, and other maintenance activities; (i) success criteria, including specific timeframe for survivorship and reproduction of each species; and (j) a detailed monitoring program, commensurate with the Plan's goals.~~

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Comment Set F3: Southern California Edison Company (cont.)

Page D.4-55

DEIR/DEIS Text:

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**VEG-5b Ensure MSHCP equivalency and consistency.** If SCE does not obtain PSE status under either the WR-MSHCP or CV-MSHCP, SCE shall prepare an analysis equivalent to the WR-MSHCP Consistency Analysis or the CV-MSHCP Joint Project Review Requirements, as appropriate. This analysis shall identify any potential conflict with the WR-MSHCP or CV-MSHCP and specify detailed measures that it will implement, as a non-participant in either plan, to pre-vent such conflict through habitat compensation or other measures. The analysis and its included specifications for avoiding MSHCP conflicts shall be subject to review and approval by CPUC and BLM, in consultation with CDFW, USFWS, the Western Riverside County Regional Conservation Authority, and the CVCC. The analysis and full implementation of each measure shall be completed prior to the start of any ground-disturbing activity within the WR-MSHCP or CV-MSHCP area.

**Implementation locations:** WR-MSHCP (all, if SCE does not obtain PSE status); CV-MSHCP (all, if SCE does not obtain PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

SCE Comment:

CEQA Guidelines state that impacts may be significant if the project would:

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Conflicting with the plans described in the CEQA guidelines is not the same as failing to demonstrate equivalency/consistency as if the project proponent were a PSE. As such, if SCE does not obtain PSE Status, appropriate state and federal endangered species act permits and conditions would be applied to the project. Please make the following revision:

**VEG-5b Ensure MSHCP equivalency and consistency.** If SCE does not obtain PSE status under either the WR-MSHCP or CV-MSHCP, SCE shall prepare an analysis to demonstrate that the project does not conflict with these MSHCPs, equivalent to the WR-MSHCP Consistency Analysis or the CV-MSHCP Joint Project Review Requirements, as appropriate. This analysis shall identify any potential conflict with the WR-MSHCP or CV-MSHCP and specify detailed measures that it will implement, as a non-participant in either plan, to prevent such conflict through habitat compensation or other measures. The analysis and its included specifications for avoiding MSHCP conflicts shall be subject to review and approval by CPUC and BLM, in consultation with CDFW, USFWS, the Western Riverside County Regional Conservation Authority, and the CVCC. The analysis and full implementation of each measure shall be completed prior to the start of any ground-disturbing activity within the WR-MSHCP or CV-MSHCP area.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-73 through D.4-77

DEIR/DEIS Text:

D.4.4.3 Phased Build Alternative

*Impact VEG-1: Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats*

*Impact VEG-2: Project activities could cause indirect degradation of surrounding vegetation and habitat from dust, interrupted sand transport, interruption of surface water flows, or introduction and spread of invasive weeds*

*Impact VEG-3: Construction, operations, and maintenance activities would affect state or federally jurisdictional waters and wetlands through vegetation removal, placement of fill, erosion, sedimentation, or degradation of water quality*

*Impact VEG-4: Construction, operations, and maintenance activities could cause direct or indirect loss of listed and special-status plants and direct or indirect effects to habitat for listed and special-status plants*

*Impact VEG-5: Construction, operations, and maintenance activities may conflict with local policies or ordinances protecting biological resources, Habitat Conservation Plans, Natural Communities Conservation Plans, Multiple Species Habitat Conservation Plans, or other approved local, regional, state, or federal conservation plans*

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements require additional survey and/or study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional biological impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

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Comment Set F3: Southern California Edison Company (cont.)

Page D.4-80

DEIR/DEIS Text:

Mitigation Measure Veg-1d: Restore or revegetate temporary disturbance areas

SCE Comment:

Timing should be negotiable if success criteria is met sooner and subsequent follow-up monitoring demonstrates continued success of a restoration site within five years. Please revise as follows:

**MITIGATION MEASURE**

**VEG-1d: Restore or revegetate temporary disturbance areas** (*see full text in Section D.4.3.3*)

**Location**

All segments.

**Monitoring / Reporting Action**

SCE submits Habitat Restoration and Revegetation Plan and annual monitoring reports; CPUC/BLM monitor approves plan and report format and content in consultation with CDFW and USFWS.

**Effectiveness Criteria**

Restoration/revegetation of all temporary disturbance areas, including sensitive vegetation and special-status species habitat. CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.

**Responsible Agency**

**Timing**

Within 12 months from the start of construction; restoration phase; for at least 5 years post-construction or at such time as performance standards are met.

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Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-81

DEIR/DEIS Text:

**Table D.4-7. Mitigation Monitoring Program Biological Resources – Vegetation VEG-2a**

<b>Monitoring / Reporting Action</b>	SCE submits Integrated Weed Management Plan; CPUC/BLM monitoring approves plan in consultation with CDFW and USFWS. SCE conducts weed inventory/mapping and monitoring. SCE documents construction vehicle and equipment washing and submits documentation to CPUC/BLM monitor upon request. SCE submits monitoring reports to CPUC/BLM monitor as specified in Integrated Weed Management Plan.
<b>Effectiveness Criteria</b>	Minimize introduction and spread of invasive plants.
<b>Responsible Agency</b>	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
<b>Timing</b>	At least 60 days prior to SCE’s application for Notice to Proceed; pre-construction, construction, post-construction restoration, and O&M phases.

**SCE Comment:**

As acknowledged in this impact assessment, the project ROW is already heavily infested/populated with weeds. Upon completion of implementation of the IWMP (through the post-construction restoration period), SCE should not be obligated to monitor and survey during O&M of the line. SCE recommends the following revisions:

**Table D.4-7. Mitigation Monitoring Program – Biological Resources – Vegetation**

<b>Monitoring / Reporting Action</b>	SCE submits Integrated Weed Management Plan; CPUC/BLM monitoring approves plan in consultation with CDFW and USFWS. SCE conducts weed inventory/mapping and monitoring. SCE documents construction vehicle and equipment washing and submits documentation to CPUC/BLM monitor upon request. SCE submits monitoring reports to CPUC/BLM monitor as specified in Integrated Weed Management Plan.
<b>Effectiveness Criteria</b>	Minimize introduction and spread of invasive plants.
<b>Responsible Agency</b>	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
<b>Timing</b>	At least 60 days prior to SCE’s application for Notice to Proceed; pre-construction, construction, and post-construction restoration <u>phases</u> , and O&M phases.

F3-170

Comment Set F3: Southern California Edison Company (cont.)

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DEIR/DEIS Text:

F3-171

MITIGATION MEASURE

**VEG-3a: Minimize impacts and ensure no net loss for jurisdictional waters and wetlands (see full text in Section D.4.3.3)**

Location

All segments.

Monitoring / Reporting Action

SCE submits a Habitat Mitigation and Monitoring Plan for affected jurisdictional areas; USACE, CDFW, RWQCB, and CPUC/BLM approve plan.

Effectiveness Criteria

Minimize impacts to jurisdictional waters and wetlands and mitigate for unavoidable impacts through ecological restoration of temporarily disturbed areas and compensation for permanently disturbed areas.

Responsible Agency

CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS, USACE, CDFW, RWQCB.

Timing

Prior to, during, and after construction.

SCE Comment:

MITIGATION MEASURE

**VEG-3a: Minimize impacts and ensure no net loss for jurisdictional waters and wetlands (see full text in Section D.4.3.3)**

Location

All segments.

Monitoring / Reporting Action

SCE submits a Habitat Mitigation and Monitoring Plan for affected jurisdictional areas; USACE, CDFW, SWRCB, EPA, RWQCB, and CPUC/BLM approve plan.

Effectiveness Criteria

Minimize impacts to jurisdictional waters and wetlands and mitigate for unavoidable impacts through ecological restoration of temporarily disturbed areas and compensation for permanently disturbed areas.

Responsible Agency

CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS, USACE, CDFW, RWQCB, SWRCB, EPA.

Timing

Prior to, during, and after construction.

## Responses to Comment Set F3 – Section D.4 Biological Resources – Vegetation

- F3-125 The commenter states that *Amsinckia intermedia* is not included in the Manual of California Vegetation (Sawyer et al., 2009) as part of the *Amsinckia* Herbaceous Alliance (Fiddleneck Fields). The commenter further states that the *Amsinckia* Herbaceous Alliance is not considered a sensitive vegetation community and should be deleted from the EIS.

The information on *Amsinckia* Herbaceous Alliance in the Draft EIR/EIS is quoted from the Proponent's Environmental Assessment (PEA), page F-262, and based on field surveys conducted by professional botanists. The Manual of California Vegetation (Sawyer et al., 2009) does not provide a complete list of all possible vegetation associations in the state and must defer at some point to the expert opinion of field botanists.

According to the California Department of Fish and Wildlife (CDFW), the *Amsinckia* Herbaceous Alliance has a G4/S4 rating. G4/S4 does not automatically indicate an imperiled sensitive community. However, given the very limited distribution of this vegetation community in the project area (as shown on the Vegetation Alliance map in the PEA, page F-281), proximity of developed areas to this occurrence, and the definition of the G4/S4 rating, which includes "...with possible cause for concern as a result of local recent declines, threats, or other factors," the characterization of *Amsinckia* Herbaceous Alliance as a locally sensitive vegetation community within the project area is warranted. Text in Section D.4.1.1 (Biological Resources – Vegetation, Regional Setting and Approach to Data Collection) of the Final EIS has been revised to clarify the status of *Amsinckia* Herbaceous Alliance and indicate that characterization of this vegetation community as a locally sensitive vegetation community within the project area is warranted.

- F3-126 The commenter states that aeolian sand is a habitat subclass within the desert scrub plant community and the narrative should address it as such.

Within the project area, aeolian sand habitat is vegetated with desert scrub, but sand dunes and sand fields are unique habitats, as recognized by CDFW (formerly the California Department of Fish and Game, CDFG), and not a subclass of any accompanying vegetation. Text in Section D.4.1.1 (Regional Setting and Approach to Data Collection) of the Final EIS has been revised to indicate that aeolian sand habitat in the project area is vegetated with desert scrub.

- F3-127 The commenter states that stabilized and partially stabilized desert dunes and sand fields are not recognized by CDFG (2010) and the G4/S3 classification is reserved for plant communities. The commenter further states that there are dunes in California authorized for recreational purposes and the EIS should not conclude that dune habitat is sensitive.

The reference for CDFG (2010) was incorrectly listed in the Draft EIR/EIS. It has been corrected in the Final EIS to reference a similar document (*Hierarchical List of Natural Communities with Holland Types*) on the same web page. The incorrectly referenced document lists only plant communities. The correctly referenced document lists all natural communities, which are primarily plant communities, but also include glaciers, desert dunes, and other unique habitats.

Stabilized and partially stabilized desert dune and sand fields are classified as G4/S3 in this document. As a G4/S3 habitat, aeolian sand is considered a sensitive natural community and does not require the presence of a sensitive plant community to qualify it as a sensitive



resource. Further, aeolian sand habitat in the Coachella Valley has suffered significant declines in recent decades, and has the potential to support sand-endemic special-status plant and wildlife species. Sand habitat within the project area is not within a designated recreation area.

- F3-128 The commenter notes that Draft EIR/EIS incorrectly refers to “species of special concern,” a term reserved for wildlife, in a discussion of special-status plants.

The commenter is correct. Text in Section D.4.1.1 (Regional Setting and Approach to Data Collection) and Section D.4.1.2 (Environmental Setting by Segment) of the Final EIS has been revised to replace “species of special concern” with “special-status plant species.”

- F3-129 The commenter states that Morongo Tribal Lands are not subject to state jurisdiction, and the Draft EIR/EIS should be revised to indicate that potential U.S. Army Corps of Engineers (USACE) jurisdictional areas would also be considered CDFW jurisdictional only outside of the Morongo Tribal Lands.

Text in Section D.4.1.1 (Regional Setting and Approach to Data Collection) of the Final EIS has been revised to clarify that CDFW jurisdiction over waters and wetlands applies only outside of Morongo Tribal Lands.

The commenter also states that Southern California Edison (SCE) did not conduct a significant nexus determination and text should be deleted in the Draft EIR/EIS regarding 196 drainages that did not meet USACE nexus criteria but are potentially subject to CDFW jurisdiction.

The referenced text from the Draft EIR/EIS regarding the 196 drainages was taken verbatim from the PEA, page 4.4-71, and is stated in the Preliminary Jurisdictional Drainage Assessment, page F-1243, included in Appendix F of the PEA. Text in Section D.4.1.1 (Regional Setting and Approach to Data Collection) of the Final EIS has been revised to indicate that the determination regarding the 196 drainages is from a Preliminary Drainage Assessment, and only those drainages outside of the Morongo Tribal Lands would be potentially subject to CDFW jurisdiction.

- F3-130 The commenter requests that text in the Draft EIR/EIS be revised to clarify the jurisdictional boundaries of the Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (USACE), State Water Resources Control Board (SWRCB), and Regional Water Quality Control Boards (RWQCBs).

Based on the updated information provided in the comment regarding the jurisdictions of the various water and wetland regulatory agencies within the project area, text in Section D.4.1.1 (Regional Setting and Approach to Data Collection), Section D.4.1.3 (Environmental Setting for Connected Actions), Section D.4.2 (Applicable Regulations, Plans, and Standards), APM BIO-9 in Section D.4.3.1.1 (Applicant Proposed Measures), Section D.4.3.3 (Impacts and Mitigation Measures) and Section D.4.6 (Mitigation Monitoring, Compliance, and Reporting) of the Final EIS has been revised to indicate that, in regard to jurisdictional waters and wetlands, the EPA has jurisdiction on Morongo Tribal Lands, and since the project extends into two RWQCB boundaries, it is subject to regulation by the SWRCB.

- F3-131 The commenter requests that the description of Devers Staging Yard be revised to state that it is an existing staging yard, and that text stating that, "use of the area may result in impacts to disturbed desert scrub... which could support special-status plant species," be deleted.
- The quoted text from the Draft EIR/EIS is summarized from, and entirely consistent with, information in the PEA, page 4.4-100. The existing staging yard, although disturbed, may support special-status plants. The text has not been revised.
- F3-132 The commenter requests that reference to *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) be removed from the list of sensitive vegetation communities. Please see Response to Comment F3-125.
- F3-133 The commenter notes that smooth tarplant was not found in Segment 4 and the reference to it should be deleted.
- The commenter is correct. As shown on Figure Ap.7-3d (Special-status Species Observations, Segments 3 & 4), smooth tarplant was observed in Segment 3, but not in adjacent portions of Segment 4. Text in Section D.4.1.2.4 (Segment 4: Beaumont and Banning) and Table Ap.7-1 has been revised in the Final EIS to list smooth tarplant as having a high probability of occurrence in Segment 4, rather than having been observed there.
- F3-134 The commenter states that there is a separate parcel of Morongo Indian Reservation land that the project right-of-way (ROW) crosses in Segment 4, and Draft EIR/EIS text and Figure Ap.7-1 should be revised accordingly.
- The commenter is correct. Text in Section D.4.1.2.4 (Segment 4: Beaumont and Banning) of the Final EIS has been revised to include the Morongo Tribal Land in Segment 4. Figure Ap.7-1 is correct as it stands and no change to it was made in the Final EIS.
- F3-135 The commenter states that aeolian sand habitat should be deleted from the list of sensitive habitats in Segment 6. Please see Response to Comment F3-127.
- F3-136 The commenter states that aeolian sand habitat should be deleted from the list of sensitive habitats for Connected Actions in the Desert Center area. Please see Response to Comment F3-127.
- F3-137 The commenter requests minor revisions to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters. Please see Response to Comment F3-130.
- F3-138 The commenter notes that there are no proposed impacts to the Colorado River watershed and recommends this section be deleted. If the section remains, the commenter requests minor revisions to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters.
- The discussion of the Colorado River watershed is in the Environmental Setting for Connected Actions (Section D.4.1.3 of the EIS). Connected Actions in the Desert Center and Blythe areas are in the Colorado River watershed, and the information presented is applicable. Regarding clarification of the jurisdiction of the EPA, USACE, SWRCB, and CDFW over wetlands and other waters, please see Responses to Comments F3-129 and F3-130.
- F3-139 The commenter requests minor revisions to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters. Please see Response to Comment F3-130.

- F3-140 The commenter notes that Draft EIR/EIS should state that Operations and Maintenance (O&M) of the proposed project would be less than or equivalent to O&M of the existing facilities.
- The comment is consistent with information provided in the PEA. Text in Section D.4.3.3 (Impacts and Mitigation Measures) of the Final EIS has been revised to state that O&M of the proposed project would be less than or equivalent to O&M of the existing facilities.
- F3-141 The commenter states that text regarding additional mitigation measures in Section D.4.3.1.1 (Applicant Proposed Measures) requires clarification, as it is not the objective of CEQA to protect resources to the extent feasible.
- This comment relates to CEQA, not NEPA. However, CPUC's response is provided for informational purposes: Text in Section D.4.3.1.1 (Applicant Proposed Measures) of the Final EIS has been revised to state that additional mitigation measures add conditions or details as needed to mitigate potential impacts to levels of insignificance rather than to protect resources to the extent feasible.
- F3-142 The commenter requests minor revisions to Applicant Proposed Measure (APM) BIO-9 to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters, and to indicate that the Habitat Mitigation and Monitoring Plan (HMMP) would describe measures to accomplish restoration or revegetation.
- Text in Table D.4-3 (Applicant Proposed Measures – Biological Resources) in Section D.4.3.1.1 (Applicant Proposed Measures) of the Final EIS has been revised to state that the HMMP would describe measures to accomplish restoration or revegetation. Regarding the jurisdiction of the EPA and SWRCB, please see Response to Comment F3-130.
- F3-143 The commenter states that chaparral, desert scrub, and aeolian sand habitat are not sensitive vegetation communities and should be deleted from the list of habitats where the following mitigation measures apply: Mitigation Measures VEG-1a (Conduct biological monitoring and reporting), VEG-1c (Minimize native vegetation and habitat loss), VEG-1d (Restore or revegetate temporary disturbance areas), and VEG-1e (Compensate for permanent habitat loss). If these plant communities are included due to their value as special-status species habitat, then mitigation should only apply to locations where special-status species are known to occur.
- Regarding aeolian sand habitat, please see Response to Comment F3-127. Chaparral and desert scrub support, or have the potential to support, special-status species, whether or not these habitats are known to be currently occupied or utilized by special-status species. The recommended mitigation would minimize, avoid, or offset the loss of special-status species habitat. The text has not been revised.
- F3-144 The commenter states that SCE's team currently includes a Project Lead Biologist, and there is therefore no reason to nominate a lead biologist. The commenter requests that this requirement be removed from the mitigation measure, and the text of the mitigation measure be revised to state that the lead biologist will oversee supervision and training of biological monitors and preparation and submission of monitoring reports and notifications. The commenter further states that it is unnecessary to have a lead biologist in place prior to pre-construction activities as long as SCE avoids impacts to biological resources.

Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) requires SCE to nominate a lead biologist. It is acknowledged that SCE currently has a Project Lead Biologist, but it cannot be assumed that the current circumstance will continue throughout project implementation, absent a mitigation requirement. The mitigation measure requires SCE to nominate a lead biologist prior to any ground disturbing activities, including pre-construction activities (e.g., geotechnical boring). As it is the lead biologist's responsibility to oversee biological monitors, and monitors are required for ground-disturbing work, the requirement to have a lead biologist in place prior to pre-construction activities is warranted.

Text in Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) in the Final EIS has been revised to state that the lead biologist will oversee biological monitors, as requested. Text in Mitigation Measure VEG-1a in the Final EIS has also been revised to further clarify the education and experience requirements of the lead biologist.

The commenter states that Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) does not acknowledge that the existing O&M activities in the project ROW are greater or at most equal to the O&M required for the project and O&M vegetation removal impacts would be less than significant without the mitigation measure.

The comment is consistent with information provided in the PEA. Impact VEG-1 (Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats) has been revised in the Final EIS to state that O&M activities associated with the Proposed Project are expected to be less than or equivalent to O&M of the existing West of Devers system and impacts would be similar to or reduced from existing conditions. Text of Mitigation Measure VEG-1a in the Final EIS has been revised to specify that Mitigation Measure VEG-1a applies to the construction and post-construction restoration phases only.

The commenter suggests revisions to Mitigation Measure VEG-1a to state that biological monitoring will occur where sensitive biological resources have the potential to occur, and to clarify biological monitors' responsibilities regarding avoidance of impacts to sensitive resources.

To ensure that biological monitoring occurs where there is the potential to impact sensitive biological resources or jurisdictional waters, the text of Mitigation Measure VEG-1a has been revised in the Final EIS to require biological monitoring during all activities that may affect sensitive biological resources, including vegetation removal/trimming, initial "drive and crush," and all ground disturbing activities, and in any area subject to project disturbance where there is a potential to impact sensitive biological resources or jurisdictional waters. This shall also apply to pre-construction, construction, and post-construction restoration phases of the Proposed Project. The mitigation measure has also been revised in the Final EIS to clarify that monitors are responsible to ensure that impacts to sensitive biological resources are avoided or minimized.

F3-145

The commenter requests that Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) include the duration of the review period for biological monitors' resumes, and suggests a period of 10 working days. The commenter further requests that additional detail be provided regarding the requirement that resumes demonstrate the appropriate education and experience to accomplish the assigned biological resources tasks.

Given the variety of biological resources tasks that may be required during project implementation, it is not possible to provide details on the appropriate education and experience required for each. Concurrence on qualification will be established on a case-by-case basis through the resume review process. The text of Mitigation Measure VEG-1a in the Final EIS has been revised to include the requested 10 working day review period.

- F3-146 The commenter requests revisions to Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) to restrict biological monitoring to areas where there is a potential to impact sensitive plant or wildlife resources and eliminate biological monitoring of pre-construction activities.

Please see Response to Comment F3-144.

- F3-147 The commenter requests revision of Mitigation Measure VEG-1b (Prepare and implement a Worker Environmental Awareness Program [WEAP]) to allow training materials to be provided in electronic form to save resources.

It is acknowledged that distributing training materials in electronic form would save resources. However, in the interest of ensuring that training materials are reliably distributed to all personnel and have the greatest chance of being referenced, a hard copy format is required. The text was not revised.

- F3-148 The commenter states that SCE should not be held responsible for events beyond SCE's control. After a fire, flood, or other disturbance, site conditions within restoration areas may be no different than surrounding vegetation. The commenter further states that the Draft EIR/EIS assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) requires that, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall be responsible for a one-time replacement. If a second event occurs, no replanting is required unless the disturbance is caused by SCE's activity.

Depending on the type and level of disturbance, surrounding native vegetation is likely to recover more readily than vegetation in restoration areas. In most cases, native vegetation would have mature root systems and an intact soil seed bank, which facilitate post-disturbance recovery. In the event of a fire, flood, or other disturbance, restoration areas generally would not be able to recover to native habitat without additional restoration work; this reduced capacity for recovery results from project-related disturbance. The text was not revised.

- F3-149 The commenter states that accurate aerial imagery is readily available, and providing up-to-date ortho-rectified aerial imagery of the project area is an unnecessary expense.

Upon completion of the project, Mitigation Measure VEG-1c (Minimize native vegetation and habitat loss) requires SCE to provide the CPUC and the BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, up-to-date ortho-rectified aerial imagery of the project area, and summary data of all discrepancies between final engineering and "as-built" conditions. It is acknowledged that accurate aerial imagery is readily available. Mitigation Measure VEG-1c in the Final EIS retains the requirement for SCE to provide

accurate aerial imagery of the project area, but the text has been revised to delete the requirement for up-to-date ortho-rectified imagery.

- F3-150 The commenter contends that after a fire, flood, or other disturbance of restoration areas, site conditions within restoration areas may be no different than surrounding vegetation. The commenter further states that the Draft EIR/EIS assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas. Revisions to Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) are suggested to delete the requirement for a one-time replacement of restoration plantings after a fire, flood, or other disturbance event beyond SCE's control.

Please see Response to Comment F3-148.

The commenter states that temporary impact areas that cannot be effectively revegetated or restored will need to be stabilized to prevent soil erosion. The commenter further suggests revisions to include these temporary disturbance areas in Part A of Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas).

Part A of Mitigation Measure VEG-1d specifies certain types of habitats where the goal of the Habitat Restoration and Revegetation Plan (HRRP) will be to minimize weed invasion, dust generation, and soil erosion. Temporary impact areas that cannot be effectively revegetated or restored require off-site compensation according to the requirements of Mitigation Measure VEG-1e (Compensate for permanent habitat loss). It is appropriate to include these areas in Part A of Mitigation Measure VEG-1d and the text of the Final EIS has been revised accordingly.

The commenter states that if remedial action is taken to meet success criteria, monitoring of restoration sites should not continue for five years beyond the date of the remedial action, as required by Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas). The commenter suggests revisions to Mitigation Measure VEG-1d to delete this requirement and also to delete the requirement that initial monitoring continue for a minimum of five years.

Monitoring of restoration areas is required for at least five years, and until success criteria are reached, to ensure that the vegetation is well established and on a trajectory toward successful restoration of native habitat values. The intent of Mitigation Measure VEG-1d was not to 'reset the clock' for remedial measures, but to require monitoring of remedial measures concurrent with that of the initial restoration. The text of Mitigation Measure VEG-1d has been revised in the Final EIS to clarify that the monitoring period for remedial measures is concurrent with that of the initial restoration.

The commenter states that chaparral, desert scrub, and aeolian sand habitat are not sensitive vegetation communities and should be deleted from restoration requirements in Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas).

Regarding aeolian sand habitat, please see Response to Comment F3-127. For chaparral and desert scrub, please see Response to Comment F3-143.

The commenter states that some of the plant communities in the project area do not have 80 percent relative cover by native species and some communities naturally have a low abso-



lute cover of native species. The mitigation requirement could mean that SCE's restoration efforts must achieve native cover greater than the on-site or adjacent plant communities.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) requires that at least 80 percent of the vegetation cover within the restoration area be contributed by native species (i.e., of the vegetation present, whatever its absolute cover may be, at least 80 percent is native with the remainder being non-native), and that absolute cover and density of native plant species is at least 60 percent of the pre-disturbance or reference vegetation cover.

The requirement that absolute cover and density of native plant species is at least 60 percent of the pre-disturbance or reference vegetation cover, would not require greater cover than is present in the reference sites. For example, if pre-disturbance cover of native vegetation in an open desert scrub community is 20 percent, the requirement for the restoration is 60 percent of this, or 12 percent native cover.

It is acknowledged that grassland and forbland in the project area may have a relative cover of native species that is less than 80 percent. The text of Mitigation Measure VEG-1d in the Final EIS has been revised to state that, in grassland or forbland habitat, this criterion will be adjusted to account for pre-disturbance non-native grass cover. However, for other habitats, the purpose of restoration is to establish native plants on a trajectory toward a functioning natural vegetation community. Allowing high non-native weed cover during the restoration period is likely to compromise the establishment of native plants and jeopardize the success of the restoration. Although native vegetation cover in restoration areas may exceed that in surrounding habitat during the restoration period, the requirement is warranted to ensure that mitigation is achieved.

The commenter states that cover and density measure the same thing and Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) should use only one or the other.

Cover refers to the area occupied by vegetation (typically expressed as a percentage) and density refers to the number of individuals (e.g., shrubs and trees) within a specified area (typically expressed as number per acre). Mitigation Measure VEG-1d requires absolute cover and density of native plant species within the restoration areas to equal at least 60 percent of the pre-disturbance or reference vegetation cover. This means that both cover of all vegetation and density of shrubs and trees are required to be at least 60 percent of the pre-disturbance or reference vegetation. The text of Mitigation Measure VEG-1d in the Final EIS has been revised to clarify that both cover of all vegetation and density of shrubs and trees are required to be at least 60 percent of the pre-disturbance or reference vegetation.

The commenter states that requiring restoration sites to persist for at least three years without irrigation before monitoring is complete is excessive and inconsistent with the two year requirement typically established by the resource agencies.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) has been revised in the Final EIS to require a minimum of two years prior to completion of monitoring to ensure that plants in restoration sites are sufficiently established to be able to survive the harsh conditions found in the project area.

The commenter states that grassland/forbland that is potentially suitable habitat for Stephens' kangaroo rat (SKR) is not a sensitive community unless it is actually occupied by SKR and restoration should be required only for occupied habitat.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) requires restoration of temporary disturbance areas in grassland/forbland that is either suitable SKR habitat or has 10 percent or greater relative cover of native perennial grass species. Suitable habitat supports, or has the potential to support, SKR whether or not the habitat is known to be currently occupied or utilized by SKR. Restoration of these habitats in temporary impact areas is required to mitigate loss of habitat for SKR. The text of Mitigation Measure VEG-1d has been revised in the Final EIS to state that habitat suitability is to be determined by a qualified SKR biologist.

The commenter suggests revising Mitigation Measure VEG-1d to state that if SCE obtains Participating Special Entity (PSE) status under either the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) or Coachella Valley MSHCP, the project's temporary impacts will be restored, revegetated, or stabilized according to the requirements of the MSHCP and Mitigation Measure VEG-1d will not apply.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) would mitigate the effects of temporary disturbance, including those occurring within the MSHCP areas. The two MSHCPs provide for ESA and CESA take authorization for covered species. The Coachella Valley MSHCP does not provide mitigation for other biological resources impacts that may be identified, such as temporary vegetation and habitat impacts, and does not require restoration or similar mitigation for such impacts. The Western Riverside County MSHCP requires implementation of Standard Best Management Practices, which include revegetation of temporary impact areas with native species, but the requirement lacks specificity. Mitigation Measure VEG-1d is necessary to mitigate the project's temporary impacts to vegetation and habitat, including those impacts occurring within the two MSHCP areas, whether or not SCE obtains PSE status. The requested revision is not made.

- F3-151 The commenter proposes adding the option to use mitigation banks to Mitigation Measure VEG-1e (Compensate for permanent habitat loss).

Text of Mitigation Measure VEG-1e in the Final EIS has been revised to include the option to use mitigation banks.

The commenter states that special-status species habitat-specific mitigation ratios from resource agency permits should supersede those in Mitigation Measure VEG-1e. Ratios applied may vary based on the relative functions and values of disturbed habitat versus replacement habitat and the ratios specified in Mitigation Measure VEG-1e should not be absolute.

Compensation ratios were established in Mitigation Measure VEG-1e (Compensate for permanent habitat loss) based on the vegetation types in the project area, as presented in the PEA, and on the selection criteria stated in Mitigation Measure VEG-1e, requiring that compensation habitat will be of equal or greater quality and function to the disturbed habitat. The text of Mitigation Measure VEG-1e was revised in the Final EIS to clarify that if resource agency take permits require different ratios than Mitigation Measure VEG-1e, the more stringent requirements will apply.



The commenter suggests removing aeolian sand, chaparral, desert scrub, and grassland/forbland from the mitigation requirements in Mitigation Measure VEG-1e (Compensate for permanent habitat loss). Only habitat in these vegetation types known to support special-status species should require mitigation, as specified in resource agency permits.

Regarding aeolian sand habitat, please see Response to Comment F3-127. For chaparral and desert scrub, please see Response to Comment F3-143. For grassland/forbland, please see Response to Comment F3-150.

The commenter states that compensation ratios in Mitigation Measure VEG-1e (Compensate for permanent habitat loss) should not be based on impacts to wildlife movement and biological connectivity because the transmission line does not block wildlife movement.

The comment is correct. Text of Mitigation Measure VEG-1e in the Final EIS has been revised to delete the reference to wildlife movement and biological connectivity.

The commenter states that coastal sage scrub (CSS) habitat along the project is patchy, and its function and value as California gnatcatcher habitat is reduced, as evidenced by negative results during recent surveys. The commenter suggests revising the mitigation ratio to 1:1 for CSS.

Mitigation Measure VEG-1e (Compensate for permanent habitat loss) establishes a mitigation ratio of 3:1 for CSS. CSS is generally of conservation concern because it is the habitat of a listed threatened bird, the California gnatcatcher. Designated critical habitat for California gnatcatcher is found along the ROW in San Bernardino County. Recent project-related surveys for this species were negative in San Bernardino County, but gnatcatchers have been reported in the project vicinity as recently as 2000. No surveys were done in Riverside County, where habitat suitability models indicate that suitable habitat for California gnatcatcher is potentially present.

Mitigation Measure VEG-1e has been revised in the Final EIS to require a mitigation ratio of 3:1 for CSS within California gnatcatcher designated critical habitat and any CSS occupied by California gnatcatcher. Mitigation Measure VEG-1e has also been revised in the Final EIS to state that a mitigation ratio of 1:1 will apply to CSS outside of California gnatcatcher designated critical habitat that is not occupied by California gnatcatcher.

The commenter states that the detailed compensatory mitigation requirements included in Mitigation Measure VEG-1e (Compensate for permanent habitat loss) are typically included in resource agency permits and may lead to inconsistencies between Mitigation Measure VEG-1e and resource agency permits.

The comment is correct, that future resource agency permits may be inconsistent with mitigation in the EIS. The compensation requirements would mitigate the project's habitat impacts, without deferring the mitigation to future permitting actions by other agencies. The text of Mitigation Measure VEG-1e has been revised in the Final EIS to indicate that, if there is a conflict between requirements in resource agency permits and Mitigation Measure VEG-1e, the more stringent requirement shall apply.

F3-152 The commenter suggests revisions to include statement that O&M impacts would be similar to existing conditions.

Please see Response to Comment F3-140. Text of Impact VEG-2 (Project activities could cause indirect degradation of surrounding vegetation and habitat from dust, interrupted sand transport, interruption of surface water flows, or introduction and spread of invasive weeds) in the Final EIS has been revised to state that O&M impacts would be similar to existing conditions.

- F3-153 The commenter states that the project ROW is already infested with weeds, and after the Integrated Weed Management Plan (IWMP) has been fully implemented and post-construction restoration is complete, SCE should not be required to monitor and survey for weeds during O&M of the transmission line.

Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) requires implementation of the IWMP. The text of Mitigation Measure VEG-2a has been revised in the Final EIS to specify that implementation of the IWMP is required during the pre-construction, construction, and post-construction restoration phases only.

- F3-154 The commenter states that after the IWMP has been fully implemented and post-construction restoration is complete, SCE should not be required to monitor and survey for weeds during O&M of the transmission line. Please see Response to Comment F3-153.

- F3-155 The commenter states that requiring a weed inventory over the entire ROW is unnecessary because substantial areas of the ROW will not be affected by construction. Also there are areas outside the ROW that will be affected and should be included in the weed inventory.

Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) has been revised in the Final EIS to specify that weed inventories include all areas (both within and outside of the ROW) subject to project-related vegetation removal, "drive and crush," and ground disturbing activities, vehicle and equipment access routes within the ROW, and all staging/storage yards.

- F3-156 The commenter states that it is preferable not to put wash stations at multiple locations or to inspect vehicles at numerous entry points, but to require a standard protocol that requires vehicles and equipment traveling between weed zones to be washed at commercial car washes.

Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) requires preparation and implementation of an IWMP that includes methods to minimize the potential transport of weed seeds onto the ROW or from one section of the ROW to another. The mitigation measure requires cleaning and inspection of construction equipment to ensure that it is free of mud and dirt that could contain weed seeds, and specifies that vehicles will be washed off-site, when possible, stating: "All vehicles will be washed off-site when possible. If off-site washing is infeasible, on-site cleaning stations will be set up at specified locations to clean equipment before it enters the work area." The protocol suggested in the comment, to use commercial car washes, is not precluded by the language of the mitigation measure. The suggested revisions were not made.

- F3-157 The commenter states that the project area is experiencing a long period of drought, and a revision is requested to eliminate the requirement to monitor weed eradication areas for three consecutive normal rainfall years with no new seedlings or resprouts before weed control efforts can cease.

It is acknowledged that California is experiencing a drought, and it could be a substantial period of time before three consecutive years of normal rainfall occur. The text of Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) has been revised in the Final EIS to require monitoring for three consecutive normal rainfall years OR for five consecutive years regardless of rainfall.

F3-158 The commenter states that there is no need for an Erosion Control Plan if a Stormwater Pollution Prevention Plan (SWPPP) is prepared and implemented. Please see Response to Comment F3-462.

F3-159 The commenter states that Mitigation Measure VEG-3a should defer to the Habitat Mitigation and Monitoring Plan (HMMP) and the applicable permit for wetland mitigation. The commenter requests revisions to the mitigation measure to indicate that it is superseded by the requirements of wetland/water permits.

Mitigation Measure VEG-3a (Minimize impacts and ensure no net loss for jurisdictional waters and wetlands) would require compensation for permanent impacts at a ratio of 1:1 for non-wetland jurisdictional areas and 3:1 for wetland jurisdictional areas. The compensation requirements would mitigate the project's habitat impacts, without deferring the mitigation to future permitting actions by other agencies. The text of Mitigation Measure VEG-3a has been revised in the Final EIS to state that in the case of any conflict between the mitigation ratios or other requirements specified in wetland/water permits for the project and the mitigation ratios or other requirements specified in Mitigation Measure VEG-3a, the higher mitigation ratios and more stringent requirements shall apply.

F3-160 The commenter states that some species can already be determined as absent and SCE should not have to continue to survey for absent shrubs. The commenter requests that text of mitigation measure be revised to exclude from surveys those species already determined to be absent.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) requires pre-construction focused surveys for special-status plants, conforming to current CDFW botanical field survey protocol. According to the protocol, the surveys will be "floristic in nature." That is, the surveys will identify all plant species located in the survey area, including common species and special-status species. Thus, the survey "target species" are not limited to certain special-status plants which may be considered unlikely to occur. The suggested revisions were not made.

F3-161 The commenter requests revision to mitigation measure to include state-listed plants. Text of Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) in the Final EIS has been revised to include state-listed plants.

F3-162 The commenter states that the regulatory basis for salvage and transplant of native cactus and yuccas is not clear and requests removal of this requirement.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) would require salvage and transplant of some species of native cactus and yuccas. The measure is not based on a regulatory requirement, but would mitigate project-related loss of wildlife habitat (vertical structure) provided by these species, as described in Impact VEG-4. The requested revision was not made.

- F3-163 The commenter states that an avoidance buffer for trees of twice the distance of the drip line is excessive, particularly for non-listed species, and requests the mitigation measure be revised to require a buffer to the edge of the drip line.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) requires a buffer around special-status shrubs and trees of twice the distance of the drip line (i.e., twice the distance from the trunk to the edge of the canopy) to protect plant roots. Tree and shrub roots may extend outward two or three times the radius of the dripline. A buffer of twice the drip line is reasonable to protect the plant from excessive root damage that may lead to loss of vigor or mortality. Mitigation Measure VEG-4a offers an option to implement site-specific measures to protect the plant if a smaller buffer is required due to project constraints. The requested revision was not made.

- F3-164 The commenter states that requirement to compensate at a 1:1 ratio of acreage and number of plants would be difficult to implement, as individual grasses may be difficult to count or growth patterns may not allow for individual counts of plants.

The special-status plants that may be affected by the project do not include turf grasses or other species that would be difficult to count. The measure was not revised.

The commenter states that mitigation requirements should not include a 100-foot buffer around each plant population because the buffer may not include suitable soils or habitat for the species.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) would require that occupied habitat will be calculated on the project site and on the compensation lands as including each special-status plant occurrence and a surrounding 100-foot buffer area. The purpose of the buffer is to provide some area surrounding the special-status plants on the compensation land to minimize disturbance, regardless of the suitability of the soils or habitat within the buffer. The measure was not revised.

The commenter recommends translocation, seed collection and reseedling, or other on-site mitigation options as an alternative to off-site compensation for special-status plants, as described in APM BIO-7.

Consistent with the comment, Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) provides a series of mitigation strategies including off-site compensation, salvage, or horticultural propagation and off-site introduction. The salvage alternative provides an option for on-site mitigation. The measure was not revised.

- F3-165 The commenter states that there are specialists available for consultation other than horticulturists at qualified institutions.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) requires that SCE consult with horticulturists at qualified institutions regarding the feasibility and likely success of salvage efforts for each species. The text of Mitigation Measure VEG-4a has been revised in the Final EIS to include qualified restoration ecologists.

- F3-166 The commenter states that regulatory basis for salvage of cacti and yuccas is not clear and deletion of this requirement is recommended.

Please see Response to Comment F3-162.

- F3-167 The commenter notes that CEQA guidelines state that impacts may be significant if the project would conflict with the provisions of an adopted habitat conservation plan. Conflicting with a habitat conservation plan is not the same as failing to demonstrate equivalency/consistency.
- This comment relates to CEQA, not NEPA. However, Mitigation Measure VEG-5b has been revised in the Final EIS to remove the word "equivalency."
- F3-168 The commenter states that there are additional impacts associated with the Phased Build Alternative that were not addressed in the Draft EIR/EIS. Please see General Response GR-4.
- F3-169 The commenter states that monitoring of restoration sites should be negotiable if success criteria are met sooner than 5 years. Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) requires monitoring of restoration areas for at least five years, and until success criteria are reached, to ensure that the vegetation is well established and on a trajectory toward successful restoration of native habitat values. The measure was not revised.
- F3-170 The commenter refers to Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) and states that the project ROW is already populated with weeds, and after the IWMP has been fully implemented and post-construction restoration is complete, SCE should not be required to monitor and survey for weeds during O&M of the transmission line. This comment is the same as Comment F3-153. Please see Response to Comment F3-153.
- F3-171 The commenter requests minor revisions to Mitigation Measure VEG-3a (Minimize impacts and ensure no net loss for jurisdictional waters and wetlands) to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters. Please see Response to Comment F3-130.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.5 Biological Resources – Wildlife

#### Page D.5-9

##### DEIR/DEIS Text:

Golden eagle has a low potential for occurrence on Segment 2. Foraging habitat is potentially present on the ROW and natural nesting habitat is potentially present within 4 miles of the ROW. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.

##### SCE Comment:

According to the Golden Eagle survey report (Appendix I to the BRTR (App. F of the PEA)), the only natural nesting habitat within 4 miles of the ROW is south of Banning, not near Segment 2.

Please make the following revision:

Golden eagle has a low potential for occurrence on Segment 2. Foraging habitat is potentially present on the ROW and ~~natural nesting habitat is potentially present within 4 miles of the ROW~~. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.

F3-172

#### Page D.5-10

##### DEIR/DEIS Text:

Golden eagle has been observed foraging near El Casco Substation on or near Segment 3. Natural nesting habitat is potentially present within 4 miles of the ROW. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.

##### SCE Comment:

According to the Golden Eagle survey report (Appendix I to the BRTR (App. F of the PEA)), the only natural nesting habitat within 4 miles of the ROW is south of Banning and south of Segments 4 and 5, not near Segment 3.

Please make the following revision:

Golden eagle has been observed foraging near El Casco Substation on or near Segment 3. ~~Natural nesting habitat is potentially present within 4 miles of the ROW~~. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.

F3-173

#### Page D.5-13

##### DEIR/DEIS Text:

The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 5. It was reported from the San Gorgonio River, approximately 2.5 miles south of the ROW, but the habitat where the transmission line would span the San Gorgonio River is not suitable (CPUC and BLM, 2006).

##### SCE Comment:

All CNDDB records for Sierra Madre (mountain) yellow-legged frog are listed as either extirpated or potentially extirpated. This should be noted in the DEIR/DEIS.

Please make the following revision: The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 5. It was reported from the San Gorgonio River, approximately 2.5 miles south of the ROW, but the habitat where the transmission line would span the San Gorgonio River is not suitable (CPUC and BLM, 2006). Further, all records for this species in the San Gorgonio Pass area are assumed to be extirpated.

F3-174

**Comment Set F3: Southern California Edison Company (cont.)**

Page D.5-14

**DEIR/DEIS Text:**

The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 6. There is a documented occurrence in the Whitewater River, approximately 3 miles north of I-10, but the habitat where the ROW crosses Whitewater Canyon is probably not suitable for this species due to intermittent surface flow. This species was not found during biological surveys (AMEC, 2012a).

**SCE Comment:**

For consistency with the comment above at 5-13, please make the following revision:

The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 6. There is a documented occurrence in the Whitewater River, approximately 3 miles north of I-10, but the habitat where the ROW crosses Whitewater Canyon is probably not suitable for this species due to intermittent surface flow. This species was not found during biological surveys (AMEC, 2012a). Further, all records for this species in the San Geronio Pass area are assumed to be extirpated.

F3-175



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.5-25

DEIR/DEIS Text:

**WIL-1a Conduct pre-construction biological resources surveys.** SCE shall assign qualified biologists to perform pre-construction biological surveys at each project work area and access route, and in the 500-foot area surrounding each work site or access route. Pre-construction surveys shall be planned and implemented to identify locations of special-status plants and wildlife and nesting birds occurring at work areas, other portions of the ROW, or in adjacent buffer areas. Specific pre-construction survey methods or protocols will vary according to the resources which may be present at any given site, and according to season. At minimum, SCE shall complete pre-construction surveys 10 days prior to beginning work in any given area, and repeat the surveys if the work site remains inactive for a period of ten days or more. During nesting season, a qualified biologist shall complete nesting bird surveys no more than four days prior to beginning work at any given area, and repeat the surveys regularly so long as work continues at the site during the nesting season.

**SCE Comment:**

A 500-foot buffer is unreasonable for most wildlife species and for some project features (e.g., access roads). Buffers will vary as appropriate based on habitat and target species, and as stipulated by project work plans and mitigation plans (e.g., NBMP).

Due to the extensive network of existing access roads along portions of the project, it may not be feasible to complete pre-construction surveys within 10-days of construction along the existing access road and a 500 ft. buffer (based on special status species potential), particularly along Segments 2 and 3. As a result, this mitigation measure may not be possible to implement.

Consistent with other terrestrial sensitive species surveys buffers, such as desert tortoise and Stephens' kangaroo-rat, the survey area should be limited to a resource and suitable habitat dependent buffer around the disturbance areas. Access roads that require heavy road improvement will also be surveyed out to the appropriate species specific survey buffer, 10 days prior to beginning road improvement work. Otherwise, access roads will not be surveyed if they are only being used to travel between work areas.

**Suggested Revision:**

**WIL-1a Conduct pre-construction biological resources surveys.** SCE shall assign qualified biologists to perform pre-construction biological surveys at each project work area ~~and access route, and in the in a buffer up to 500-foot area surrounding each work site or access route.~~ Buffers areas will vary as appropriate based on habitat and target species, and as stipulated by project work plans and mitigation plans (e.g., NBMP). Access roads that require heavy road improvement will also be surveyed out to the appropriate species specific survey buffer, 10 days prior to beginning road improvement work. Otherwise, access roads will not be surveyed if they are only being used to travel between work areas. Pre-construction surveys shall be planned and implemented to identify locations of special-status plants and wildlife and nesting birds occurring at work areas, other portions of the ROW, or in adjacent buffer areas. Specific pre-construction survey methods or protocols will vary according to the resources which may be present at any given site, and according to season. At minimum, SCE shall complete pre-construction surveys 10 days prior to beginning work in any given area, and repeat the surveys if the work site remains inactive for a period of ten days or more. During nesting season, a qualified biologist shall complete nesting bird surveys no more than four days prior to beginning work at any given area, and repeat the surveys regularly so long as work continues at the site during the nesting season.

F3-176



Comment Set F3: Southern California Edison Company (cont.)

Page D.5-27

DEIR/DEIS Text:

WIL-1b

**Wildlife netting or exclusion fencing.** SCE may install temporary or permanent netting or fencing around equipment, work areas, or project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes, or prevent birds from nesting on equipment or facilities. Bird deterrent netting will be maintained free of holes and will be deployed and secured on the equipment in a manner that, insofar as possible, prevents wildlife from becoming trapped inside the netted area or within the excess netting. The biological monitor will inspect netting (if installed) twice daily, at the beginning and close of each work day. The biological monitor will inspect exclusion fence (if installed) weekly and will inform SCE of any needed repairs; SCE shall promptly repair any damage to the exclusion fencing.

SCE Comment:

Please make the following revision for consistency with the monitoring of netting as discussed as part of the Nesting Bird Management Plan:

**Wildlife netting or exclusion fencing.** SCE may install temporary or permanent netting or fencing around equipment, work areas, or project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes, or prevent birds from nesting on equipment or facilities. Bird deterrent netting will be maintained free of holes and will be deployed and secured on the equipment in a manner that, insofar as possible, prevents wildlife from becoming trapped inside the netted area or within the excess netting. Netting installed within established material yards will be inspected daily. The biological monitor will inspect netting that is installed on vegetation (if installed) twice daily, at the beginning and close of each work day. The biological monitor will inspect exclusion fence (if installed) weekly and will inform SCE of any needed repairs; SCE shall promptly repair any damage to the exclusion fencing.

Page D.5-27

DEIR/DEIS Text:

**Dead animals.** Dead animals of non-special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate local animal control agency within 24 hours. A biological monitor shall safely move the carcass out of the road or work area as needed. Dead animals of special-status species found on project roads, work areas, or the ROW shall be reported to CDFW within one work day and the carcass handled as directed by CDFW.

SCE Comment:

Please make the following revision:

**Dead animals.** Dead animals of non-special-status species found on project unpaved roads, work areas, or the ROW shall be reported to the appropriate local animal control agency within 24 hours. A biological monitor shall safely move the carcass out of the road or work area as needed. Dead animals of special-status species found on unpaved project roads, work areas, or the ROW shall be reported to CDFW within one work day and the carcass handled as directed by CDFW.

F3-177

F3-178

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.5-27 through 28

### DEIR/DEIS Text:

**Injured wildlife.** SCE shall create and implement guidelines for dealing with injured or entrapped wildlife found on or near project roads, work areas, or the ROW, whether or not the injuries are project-related, and provide these guidelines to all biological monitors. If an animal is entrapped, a qualified biological monitor shall free the animal if feasible, or work with construction crews to free the animal, in compliance with applicable safety regulations and project requirements. If biological monitors cannot free the animal or the animal is too large or dangerous for monitors to handle, SCE shall contact and work with animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible.

SCE shall ensure that one or more qualified biological monitors receive training in the safe and proper handling and transport of injured wildlife and are provided with the appropriate equipment. These trained and equipped monitors shall be available to capture and transport injured wildlife to a local wildlife rehabilitator or veterinarian as needed. If the injured animal is too large or dangerous for monitors to handle, or a trained and equipped monitor is not available, SCE shall contact and work with a local wildlife rehabilitator, animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible. SCE shall bear the costs of veterinary treatment and rehabilitation for any injured wildlife found on or near project roads, work areas, or the ROW and any wildlife injured by project-related activities. Additionally, any entrapped or injured special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate resource agency within one work day.

### SCE Comment:

SCE should only be responsible for project-related wildlife injuries. As such please make the following revisions:

**Injured wildlife.** SCE shall create and implement guidelines for dealing with injured or entrapped wildlife found on or near project roads, work areas, or the ROW, ~~whether or not the injuries are project-related~~, and provide these guidelines to all biological monitors. If an animal is entrapped, a qualified biological monitor shall free the animal if feasible, or work with construction crews to free the animal, in compliance with applicable safety regulations and project requirements. If biological monitors cannot free the animal or the animal is too large or dangerous for monitors to handle, SCE shall contact and work with animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible.

SCE shall ensure that one or more qualified biological monitors receive training in the safe and proper handling and transport of injured wildlife and are provided with the appropriate equipment. These trained and equipped monitors shall be available to capture and transport injured wildlife to a local wildlife rehabilitator or veterinarian as needed. If the injured animal is too large or dangerous for monitors to handle, or a trained and equipped monitor is not available, SCE shall contact and work with a local wildlife rehabilitator, animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible. SCE shall bear the costs of veterinary treatment and rehabilitation for any injured wildlife ~~found on or near project roads, work areas, or the ROW and any wildlife injured~~ by project-related activities. Additionally, any entrapped or injured special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate resource agency within one work day.

F3-179

Comment Set F3: Southern California Edison Company (cont.)

Page D.5-28

DEIR/DEIS Text:

**Rattlesnake guidelines.** Prior to the start of construction, SCE shall prepare and implement guidelines for dealing with rattlesnakes found in or near project work areas and access roads and provide these guidelines to all biological monitors, safety staff, and other personnel. Killing or harming rattlesnakes or other wildlife is not authorized. If SCE determines that it is appropriate for biological monitors or other project personnel to handle rattlesnakes, SCE shall ensure that an adequate number of qualified individuals are trained in the safe and proper handling of rattlesnakes and provided with the appropriate safety and snake handling equipment, including a secure storage container for transporting snakes. These trained and equipped individuals shall be available to remove rattlesnakes found in or near project work areas and access roads as needed and relocate them to appropriate nearby habitat. Other project personnel shall not harass, or handle rattlesnakes, except as required to maintain immediate safety or in accordance with the guidelines developed by SCE. Handling and relocation of rattlesnakes shall be documented, and the species of rattlesnake determined whenever possible. If a special-status rattlesnake is relocated, documentation shall be sub-mitted to CPUC, BLM, and CDFW.

Alternately, SCE may determine that project personnel shall not handle or approach rattlesnakes. If so, the guidelines shall specify an alternate course of action for rattlesnake encounters, such as avoiding work activity near the snake and monitoring its location and activity until it leaves the area.

SCE Comment:

Prior to the start of construction, SCE will prepare and implement a Worker Environmental Awareness Program (WEAP) that includes guidelines for handling and/or avoiding rattlesnakes.

The section below is therefore redundant and does not mitigate a specific significant impact. Please make the following revision:

**Rattlesnake guidelines.** Prior to the start of construction, SCE shall prepare and implement guidelines for dealing with rattlesnakes found in or near project work areas and access roads and provide these guidelines to all biological monitors, safety staff, and other personnel. Killing or harming rattlesnakes or other wildlife is not authorized. If SCE determines that it is appropriate for biological monitors or other project personnel to handle rattlesnakes, SCE shall ensure that an adequate number of qualified individuals are trained in the safe and proper handling of rattlesnakes and provided with the appropriate safety and snake handling equipment, including a secure storage container for transporting snakes. These trained and equipped individuals shall be available to remove rattlesnakes found in or near project work areas and access roads as needed and relocate them to appropriate nearby habitat. Other project personnel shall not harass, or handle rattlesnakes, except as required to maintain immediate safety or in accordance with the guidelines developed by SCE. Handling and relocation of rattlesnakes shall be documented, and the species of rattlesnake determined whenever possible. If a special-status rattlesnake is relocated, documentation shall be sub-mitted to CPUC, BLM, and CDFW.

Alternately, SCE may determine that project personnel shall not handle or approach rattlesnakes. If so, the guidelines shall specify an alternate course of action for rattlesnake encounters, such as avoiding work activity near the snake and monitoring its location and activity until it leaves the area.

F3-180

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.5-28 through 31

### DEIR/DEIS Text:

F3-181

**WIL-1c Prepare and implement a Nesting Bird Management Plan.** [Supersedes APM BIO-3] SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with CPUC, BLM, CDFW, and USFWS. The NBMP shall describe methods to minimize potential project effects to nesting birds, and avoid any potential for unauthorized take. Project-related disturbance including construction and pre-construction activities shall not proceed until approval of the NBMP by CPUC and BLM in consultation with CDFW and USFWS.

**NBMP Content.** The NBMP shall include: (1) definitions of standard nest buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become necessary under special circumstances; (4) a rigorous monitoring protocol including qualifications of monitors, monitoring schedule, and field methods, to ensure that any project-related effects to nesting birds will be minimized; and (5) a protocol for documenting and reporting any inadvertent contact or effects to birds or nests.

The paragraphs below describe the NBMP requirements in further detail.

**Background.** The Background section of the NBMP shall include the following:

A summary of applicable state and federal laws and regulations, including definition of what constitutes a nest or active nest under state and federal law. This section shall describe SCE's proposed applicability of the NBMP in the event that state or federal regulations affecting nesting birds may be revised before project implementation.

A list of bird species potentially nesting on or near the ROW or other work areas, indicating approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, vegetation, structures, etc.), tolerance to disturbance (if known) and any conservation status for each species. This section will also note any species that do not require avoidance measures (e.g., rock pigeons).

A list of the types of project activities (construction, operations, and maintenance) that may occur during nesting season, with a short description of the noise, physical disturbance, and lighting resulting from each activity.

A discussion of project activity scheduling, to avoid or minimize project impacts to nesting birds. Clearing of any vegetation, preparation in open or barren areas, or other project-related activities that may adversely affect breeding birds shall be scheduled outside the nesting season, as feasible.

**Pre-construction nest surveys.** Pre-construction nest surveys will be conducted prior to any construction activities scheduled during the breeding period. For this project, the breeding period will be defined as January 1 through August 31. The NBMP shall describe the proposed field methods, survey timing, and qualifications of field biologists. Field biologist qualifications will be subject to review by CPUC and BLM. The biologists conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques such as those described in Martin and Guepel (1993). Nest surveyors will be instructed to focus their efforts on bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). Surveys shall be conducted in accordance with the following guidelines.

- Surveys shall cover all potential nesting habitat within the ROW or other work areas and access routes and within 500 feet of these areas (100 feet for access routes). Where the 500-foot distance extends onto private property, SCE will make a reasonable effort to obtain permission to access the property for the surveys but, if permission cannot be obtained, then binocular surveys from the ROW boundary may be substituted for standard field survey methods.
- Pre-construction surveys shall be conducted for each work area, no longer than 10 days prior to the start of construction activity. Additional follow-up surveys may be required if periods of construction inactivity exceed one week in any given area (an interval during which birds may establish a nesting territory and initiate egg laying and incubation).
- Prior to the start of any nesting season construction activities, SCE shall provide the CPUC and BLM a report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); a list of species observed; and electronic data identifying nest locations and the boundaries of buffer zones. The electronic data set will be updated regularly throughout the nesting season. The format and contents of this report will be described in the draft NBMP and will be subject to review and approval by CPUC and BLM.

### Comment Set F3: Southern California Edison Company (cont.)

#### Nest Buffers and Acceptable Activities

The NBMP shall specify measures to delineate buffers on the work site, to consist of clearly visible marking and signage, as well as inspection procedures to ensure that markings and signage remain in place so long as the nest is active. Buffer locations shall be communicated to construction crews, inspectors, helicopter pilots, and other field personnel, and shall remain in effect until formally discontinued (when each nest is no longer active). The NBMP shall specify a procedure for written notification of release of nest buffer restrictions to field personnel when nests become inactive; these notifications shall be provided to CPUC, BLM, CDFW, and USFWS in daily reports. In addition, the NBMP shall specify measures to ensure the buffers are observed, including a direct communication and decision protocol to stop work within buffer areas. In some cases, active nests may be found while work is underway. Therefore, the NBMP shall include a protocol for stopping ongoing work within the buffer area, securing the work site, and removing personnel and equipment from the buffer.

The NBMP shall describe proposed measures to avoid take or adverse effects to nests, such as buffer distances from active nests. These measures shall be based on the specific nature of the bird species and conservation status, and other pertinent factors.

The NBMP will identify bird species (or groups of species) that are relatively tolerant or intolerant of human activities and specify smaller or larger buffer distances as appropriate for each species. If no information is available to specify a buffer distance for a species, then the NBMP shall specify 300 feet as a standard buffer distance, and 500 feet for raptors, special-status species or listed threatened or endangered species. All applicable avoidance measures, including buffer distances, must be continued until nest monitoring (below) confirms that the nestlings have fledged and dispersed, or the nest is no longer active.

For each special-status species potentially nesting within or near project work areas, the NBMP shall specify applicable buffers and any additional nest protection measures, specialty monitoring, or restrictions on work activities.

The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspection or BMP repair) including conditions and restrictions, and any monitoring required. The NBMP shall include pictorial representation showing buffer distances for ground buffers, vertical helicopter buffers, and horizontal helicopter buffers for nests near the ground and nests in towers.

#### Nest Buffer Modification or Reduction

At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist, approved by CPUC and BLM in consultation with the CDFW and USFWS. The NBMP shall provide a procedure and timing requirements for notifying CPUC, BLM, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format.

**Nest deterrents.** The NBMP shall describe any proposed measures or deterrents to prevent or reduce bird nesting activity on project equipment or facilities, such as buoys, visual or auditory hazing devices, bird repellents, securing of materials, and netting of materials, vehicles, and equipment. It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance and training for the contractor to properly install, maintain, and use nest deterrents; and daily monitoring of nest deterrents to ensure proper installation and functioning and prevent injury or entrapment of birds or other animals. In the event that an active nest is located on project facilities, materials or equipment, SCE will either (1) avoid disturbance or use of the facilities, materials or equipment (e.g., by red-tag) until the nest is no longer active, or (2) coordinate with the CPUC, BLM, CDFW, and USFWS to obtain authorization to remove the nest. The NBMP shall describe the proposed procedure for removal of nests, including wildlife rehabilitation options.

**Communication.** The NBMP shall specify the responsibilities of construction monitors in regards to nests and nest issues, and specify a direct communication protocol to ensure that nest information and potential adverse impacts to nesting birds can be promptly communicated from nest monitors to construction monitors, so that any needed actions can be taken immediately.

The NBMP shall specify a procedure to be implemented following accidental disturbance of nests or project-related premature fledging, including wildlife rehabilitation options. It also shall describe any proposed measures, and applicable circumstances, to prevent take of precocial young of ground-nesting birds such as

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cont.

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

killdeer or quail. For example, chick fences may be used to prevent them from entering work areas and access roads. Finally, the NBMP will specify a procedure for removal of inactive nests, including verification that the nest is inactive and notification and approval process prior to removal.

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**Monitoring.** SCE shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures (above). The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to project work areas, bird nesting activity, project-related disturbance, and outcome of each nest. SCE shall monitor each nest until nestlings have fledged and dispersed or until the nest becomes inactive. In addition, monitoring shall include pre-construction surveys, daily sweeps of work areas and equipment, and any special monitoring requirements for particular activities (tree trimming, vegetation removal, etc.) or particular species (noise monitoring, etc.). Nest monitoring shall continue throughout the breeding season during each year of the project's construction activities.

**Reporting.** Throughout the construction phase of the project, nest locations, project active-ties in the vicinity of nests (including helicopter traces), and any adjustments to buffer areas shall be updated and available to CPUC monitors on a daily basis. All buffer reduction notifications and prompt notifications of nest-related non-compliance and corrective actions will be made via email to CPUC monitors. The draft NBMP shall include a proposed format for daily reporting (e.g., spreadsheet available online, tracking each nest). In addition, the NBMP shall specify the format and content of nest data to be provided in regular monitoring and compliance reports. At the end of each year's nest season, SCE will submit an annual NBMP report to the CPUC, BLM, CDFW, and USFWS. The annual report shall describe all preconstruction survey work, monitoring data (including names of monitors, activities and sites visited throughout the season), all reductions from standard buffer distances, buffer incursions and nest disturbance, project-related take of nesting birds, injury or entrapment of birds or other animals due to nest deterrents, and nest outcomes for all nests documented throughout the year.

**Implementation locations:** San Bernardino County (all); WR-MSHCP (all, regardless of SCE's PSE status); CV-MSHCP (all, regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

#### SCE Comment:

The following revisions to WIL-1c are requested due to the redundant detail included in the measure which will be included in the required Nesting Bird Management Plan. Having this level of detail in the Mitigation Measure may result in potential conflicts with the Nesting Bird Management Plan, which is intended to be an adaptive plan.

In the unlikely event that a Nesting Bird Management Plan is not approved prior to the start of construction, a default buffer of 300 feet for common bird species and 500 feet for special status species would be implemented to avoid take of active bird nests.

In addition, required avian surveys should begin Feb 1; however, general pre-construction surveys and sweeps would begin focusing on potential raptor and raven nesting as early as January 1.

For the reasons above, please make the following revisions:

**WIL-1c Prepare and implement a Nesting Bird Management Plan.** [Supersedes APM BIO-3] SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with CPUC, BLM, CDFW, and USFWS. The NBMP shall describe methods to minimize potential project effects to nesting birds, and avoid any potential for unauthorized take. Project-related disturbance including construction and pre-construction activities shall not proceed within 300 feet of common bird species (500 feet for raptors, special-status species or listed threatened or endangered species, except for golden eagle as described in WIL-2f) until approval of the NBMP by CPUC and BLM in consultation with CDFW and USFWS.

**NBMP Content.** The NBMP shall include: (1) definitions of standard default nest avoidance buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become necessary under special circumstances; (4) a rigorous monitoring protocol including qualifications of monitors, monitoring schedule, and field methods, to ensure that any project-related effects to nesting birds will be minimized; and (5) a protocol for documenting and reporting any inadvertent contact or effects to birds or nests.

The paragraphs below describe the NBMP requirements in further detail.

**Background.** The Background section of the NBMP shall include the following:



### Comment Set F3: Southern California Edison Company (cont.)

- A summary of applicable state and federal laws and regulations, including definitions of what constitutes a nest or active nest of what constitutes a nest or active nest under state and federal law. This section shall describe SCE's proposed applicability of the NBMP in the event that state or federal regulations affecting nesting birds may be revised before project implementation.
- A list of bird species potentially nesting on or near the ROW or other work areas, indicating approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, vegetation, structures, etc.), tolerance to disturbance (if known) and any conservation status for each species. This section will also note any species that do not require avoidance measures (e.g., rock pigeons).
- A list of the types of project activities (construction, operations, and maintenance) that may occur during nesting season, with a short description of the noise, physical disturbance, and lighting resulting from each activity.
- A discussion of project activity scheduling, to avoid or minimize project impacts to nesting birds. Clearing of any vegetation, site preparation in open or barren areas, or other project-related activities that may adversely affect breeding birds shall be scheduled outside the nesting season, as feasible.

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**Pre-construction nest surveys.** Pre-construction nest surveys will be conducted prior to any construction activities scheduled during the breeding period. For this project, the breeding period will be defined as January February 1 through August 31. Pre-construction surveys and sweeps will begin focusing on potential raptor and raven nesting substrates as early as January 1. The NBMP shall describe the proposed field methods, survey timing, and qualifications of field biologists. Field biologist qualifications will be subject to review by CPUC and BLM. The biologists conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques such as those described in Martin and Guepel (1993). Nest surveyors will be instructed to focus their efforts on bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). Surveys shall be conducted in accordance with the following guidelines:

- Surveys shall cover all potential nesting habitat within the ROW or other work areas and access routes and within 500 feet of these areas (100 feet for access routes). Where the 500-foot distance extends onto private property, SCE will make a reasonable effort to obtain permission to access the property for the surveys but, if permission cannot be obtained, then binocular surveys from the ROW boundary may be substituted for standard field survey methods.
- Pre-construction surveys shall be conducted for each work area, no longer than 10 days prior to the start of construction activity. Additional follow-up surveys may be required if periods of construction inactivity exceed one week in any given area (an interval during which birds may establish a nesting territory and initiate egg laying and incubation).
- Prior to the start of any nesting season construction activities, SCE shall provide the CPUC and BLM a report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); a list of species observed; and electronic data identifying nest locations and the boundaries of buffer zones. The electronic data set will be updated regularly throughout the nesting season. The format and contents of this report will be described in the draft NBMP and will be subject to review and approval by CPUC and BLM.

#### Nest Buffers and Acceptable Activities

The NBMP shall specify measures to delineate buffers on the work site, to consist of clearly visible marking and signage, as well as inspection procedures to ensure that markings and signage remain in place so long as the nest is active. Buffer locations shall be communicated to construction crews, inspectors, helicopter pilots, and other field personnel, and shall remain in effect until formally discontinued (when each nest is no longer active). The NBMP shall specify a procedure for written notification of release of nest buffer restrictions to field personnel when nests become inactive; these notifications shall be provided to CPUC, BLM, CDFW, and USFWS in daily reports. In addition, the NBMP shall specify measures to ensure the buffers are observed, including a direct communication and decision protocol to stop work within buffer areas. In some cases, active nests may be found while work is underway. Therefore, the NBMP shall include a protocol for stopping ongoing work within the buffer area, securing the work site, and removing personnel and equipment from the buffer.

The NBMP shall describe proposed measures to avoid take or adverse effects to nests, such as buffer distances from active nests. These measures shall be based on the specific nature of the bird species and conservation status, and other pertinent factors.

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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The NBMP will identify bird species (or groups of species) that are relatively tolerant or intolerant of human activities and specify smaller or larger buffer distances as appropriate for each species. If no information is available to specify a buffer distance for a species, then the NBMP shall specify 300 feet as a standard buffer distance, and 500 feet for raptors, special-status species or listed threatened or endangered species. All applicable avoidance measures, including buffer distances, must be continued until nest monitoring (below) confirms that the nestlings have fledged and dispersed, or the nest is no longer active.

For each special-status species potentially nesting within or near project work areas, the NBMP shall specify applicable buffers and any additional nest protection measures, specialty monitoring, or restrictions on work activities.

The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspection or BMP repair) including conditions and restrictions, and any monitoring required. The NBMP shall include pictorial representation showing buffer distances for ground buffers, vertical helicopter buffers, and horizontal helicopter buffers for nests near the ground and nests in towers.

#### Nest Buffer Modification or Reduction

At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist, approved by CPUC and BLM in consultation with the CDFW and USFWS. The NBMP shall provide a procedure and timing requirements for notifying CPUC, BLM, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format.

**Nest deterrents.** The NBMP shall describe any proposed measures or deterrents to prevent or reduce bird nesting activity on project equipment or facilities, such as buoys, visual or auditory hazing devices, bird repellents, securing of materials, and netting of materials, vehicles, and equipment. It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance and training for the contractor to properly install, maintain, and use nest deterrents; and daily monitoring of nest deterrents to ensure proper installation and functioning and prevent injury or entrapment of birds or other animals. In the event that an active nest is located on project facilities, materials or equipment, SCE will either (1) avoid disturbance or use of the facilities, materials or equipment (e.g., by red tag) until the nest is no longer active, or (2) coordinate with the CPUC, BLM, CDFW, and USFWS to obtain authorization to remove the nest. The NBMP shall describe the proposed procedure for removal of nests, including wildlife rehabilitation options.

**Communication.** The NBMP shall specify the responsibilities of construction monitors in regards to nests and nest issues, and specify a direct communication protocol to ensure that nest information and potential adverse impacts to nesting birds can be promptly communicated from nest monitors to construction monitors, so that any needed actions can be taken immediately. The NBMP shall specify a procedure to be implemented following accidental disturbance of nests or project-related premature fledging, including wildlife rehabilitation options. It also shall describe any proposed measures, and applicable circumstances, to prevent take of precocial young of ground-nesting birds such as killdeer or quail. For example, chick fences may be used to prevent them from entering work areas and access roads. Finally, the NBMP will specify a procedure for removal of inactive nests, including verification that the nest is inactive and notification and approval process prior to removal.

**Monitoring.** SCE shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures (above). The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to project work areas, bird nesting activity, project-related disturbance, and nest outcomes. Of each nest, SCE shall monitor each nest until nestlings have fledged and dispersed or until the nest becomes inactive. In addition, monitoring shall include pre-construction surveys, daily sweeps of work areas and equipment, and any special monitoring requirements for particular activities (tree trimming, vegetation removal, etc.) or particular species (noise monitoring, etc.). Nest monitoring shall continue throughout the breeding season during each year of the project's construction activities.

**Reporting.** Throughout the construction phase of the project, nest locations, project active-ties in the vicinity of nests (including helicopter traces), and any adjustments to buffer areas shall be updated and available to CPUC monitors on a daily basis. All buffer reduction notifications and prompt notifications of nest-related



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non-compliance and corrective actions will be made via email to CPUC monitors. The draft NBMP shall include a proposed format for daily reporting (e.g., spreadsheet available online, tracking each nest). In addition, the NBMP shall specify the format and content of nest data to be provided in regular monitoring and compliance reports. At the end of each year's nest season, SCE will submit an annual NBMP report to the CPUC, BLM, CDFW, and USFWS. The annual report shall describe all preconstruction survey work, monitoring data (including names of monitors, activities and sites visited throughout the season), all reductions from standard buffer distances, buffer incursions and nest disturbance, project-related take of nesting birds, injury or entrapment of birds or other animals due to nest deterrents, and nest outcomes for all nests documented throughout the year.

**Implementation locations:** San Bernardino County (all); WR-MSHCP (all, regardless of SCE's PSE status); CV-MSHCP (all, regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

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**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

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**DEIR/DEIS Text:**

**WIL-2b Prepare and implement Raven Monitoring, Management, and Control Plan.** SCE shall pre-prepare and implement a Raven Monitoring, Management, and Control Plan (Raven Plan) consistent with USFWS raven management guidelines and that meets the approval of the CPUC and BLM in consultation with USFWS, and CDFW. The purpose of the Raven Plan shall be to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, restoration, and O&M phases. The Plan shall address all project components and their potential effects on raven numbers and activity. The threshold for implementation of raven control measures shall be any increases in raven numbers from baseline conditions, as detected by monitoring to be implemented pursuant to the Plan. Regardless of raven monitoring results, SCE shall be responsible for all other aspects of raven management described in the Raven Plan, such as avoidance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. In addition, to offset the cumulative contributions of the project to desert tortoise impacts from increased raven numbers, SCE shall contribute to the USFWS Regional Raven Management Program. SCE shall:

**1. Prepare and implement a Raven Management Plan** that shall include, but shall not be limited to the following components. The Plan shall be reviewed and approved by CPUC, BLM, USFWS, and CDFW prior to the start of construction activities.

a. Identify all potential project activities, structures, components, and other effects that could provide predator subsidies or attractants, including potential sources of food and water, and nesting materials, as well as nest or perch sites. These will include, but will not be limited to: waste food material, road-killed animals, water storage, potential pooling from leaks, dust control, or wastewater, debris from brush clearing, and perch or roost sites on project facilities and infrastructure.

b. Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities.

c. Appoint a qualified biologist who will implement a monitoring schedule and field methods for the purpose of locating any ravens present the project vicinity and detecting any increase in raven numbers or activity.

d. Specify raven activity thresholds for implementation of control measures.

e. Describe control practices for ravens to be implemented as needed based on the monitoring results.

f. Address monitoring and nest removal during construction and for the life of the project.

g. Describe reporting schedules and requirements.

**2. Contribute to the USFWS Regional Raven Management Program.** No later than 30 days prior to the start of construction, SCE shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of \$105 per acre of long-term or permanent project disturbance to the national Fish and Wildlife Federation Renewable Energy Action Team raven control account.

**Implementation locations:** This mitigation measure applies on BLM lands and is recommended on all Morongo Tribal Lands. No suitable desert tortoise habitat is present within San Bernardino County and the WR-MSHCP; therefore, this mitigation measure does not apply in these jurisdictions. In the CV-MSHCP, this mitigation measure shall apply in its entirety regardless of SCE's PSE status.

**SCE Comment:**

The raven nesting opportunities currently present on the WOD corridor would be reduced by the Proposed Project. Implementation of this plan during construction and post-construction restoration along with the payment into the USFWS Regional Raven Management Program will more than adequately reduce the potential impact to less than significant, without requiring that this plan apply to O&M activities. Additionally, this measure should only apply to acreage impacts in suitable desert tortoise habitat. If SCE decides to become a PSE in CV-MSHCP, take of desert tortoise will be obtained and fees for impacts will have already been paid. This measure should not apply to the portion of the project in the CV-MSHCP.

The preparation and implementation of a Raven Management Plan is typically required as a conservation or mitigation measure to minimize impacts to desert tortoise in a USFWS Biological Opinion or CDFW Incidental

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**Comment Set F3: Southern California Edison Company (cont.)**

Take Statement, due to raven predation. Due to the limited distribution of desert tortoise individuals and habitat along the West of Devers Corridor and the existing nesting opportunities available (i.e. existing towers, billboards, trees, etc.), the existing conditions should be taken into consideration when developing the plan.

For the reasons discussed above, please make the following revisions:

**WIL-2b Prepare and implement Raven Monitoring, Management, and Control Plan.** SCE shall pre-pare and implement a Raven Monitoring, Management, and Control Plan (Raven Plan) consistent with USFWS raven management guidelines and that meets the approval of the CPUC and BLM in consultation with USFWS, and CDFW. The purpose of the Raven Plan shall be to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, and restoration, and O&M phases. The Plan shall address all project components and their potential effects on raven numbers and activity. The threshold for implementation of raven control measures shall be any increases in raven numbers from baseline conditions, as detected by monitoring to be implemented pursuant to the Plan. Regardless of raven monitoring results, SCE shall be responsible for all other aspects of raven management described in the Raven Plan, such as avoidance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. In addition, to offset the cumulative contributions of the project to desert tortoise impacts from increased raven numbers, SCE shall contribute to the USFWS Regional Raven Management Program. SCE shall:

**1. Prepare and Implement a Raven Management Plan** that may ~~shall~~ include, but ~~shall~~ may not be limited to the following components. The plan will outline clear objectives and take into consideration the existing raven nesting opportunities and low distribution of desert tortoise within and adjacent to the ROW. The Plan shall be reviewed and approved by CPUC, BLM, USFWS, and CDFW prior to the start of construction activities.

a. Identify all potential project activities, structures, components, and other effects that could provide predator subsidies or attractants, including potential sources of food and water, and nesting materials, as well as nest or perch sites. These will include, but will not be limited to: waste food material, road-killed animals, water storage, potential pooling from leaks, dust control, or wastewater, debris from brush clearing, and perch or roost sites on project facilities and infrastructure.

b. Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities.

c. Appoint a qualified biologist who will implement a monitoring schedule and field methods for the purpose of locating any ravens present the project vicinity and detecting any increase in raven numbers or activity.

d. Specify raven activity thresholds for implementation of control measures.

e. Describe control practices for ravens to be implemented as needed based on the monitoring results. f. Address monitoring and nest removal during construction and for the life of the project.

g. Report reporting schedules and requirements.

**2. Contribute to the USFWS Regional Raven Management Program.** No later than 30 days prior to the start of construction, SCE shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of \$105 per acre of long-term or permanent project disturbance to the national Fish and Wildlife Federation Renewable Energy Action Team raven control account.

**Implementation locations:** This mitigation measure applies to impacts to suitable habitat on BLM lands and is recommended for all impacts to suitable habitat on all Morongo Tribal Lands. No suitable desert tortoise habitat is present within San Bernardino County and the WR-MSHCP; therefore, this mitigation measure does not apply in these jurisdictions. ~~In the CV-MSHCP,~~ This mitigation measure shall apply in its entirety to the CV-MSHCP area if SCE chooses not to become a regardless of SCE's PSE.

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cont.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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### DEIR/DEIS Text:

#### WIL-2c Conduct surveys and avoidance for threatened or endangered riparian birds.

Construction activities shall avoid suitable habitat for listed riparian birds. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS and obtain appropriate take authorizations or permits. SCE shall implement the conservation measures contained within these permits. If construction activities will occur during the breeding season potentially suitable habitat for listed riparian birds, a qualified biologist shall conduct protocol surveys of the project area and adjacent areas within 500 feet. USFWS protocol surveys shall be conducted for southwestern willow flycatcher, yellow-billed cuckoo, and least Bell's vireo. The surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Where protocol surveys determine that listed riparian birds are present, SCE shall conduct additional focused nest location surveys, to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Protocol surveys, shall be conducted within one year prior to the start of construction and shall continue annually during each nesting season until completion of construction and restoration activities. At a minimum, surveys shall be conducted from 15 May to 17 July for southwestern willow flycatcher, from 10 April to 31 July for least Bell's vireo, and from 1 June to 31 August for yellow-billed cuckoo.

These surveys may be modified through coordination with the USFWS, CDFW, BLM, and the CPUC based on the condition of habitat, the observation of the species, or avoidance of riparian areas during the breeding season. SCE shall submit documentation providing results of the protocol surveys for listed riparian birds to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review in consultation with USFWS and CDFW.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while listed riparian birds occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting birds, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site
- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

**Implementation locations:** This mitigation measure applies on BLM lands, throughout the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and within San Bernardino County, and is recommended on all Morongo Tribal Lands.

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### Comment Set F3: Southern California Edison Company (cont.)

#### SCE Comment:

If SCE obtains PSE Status, yearly protocol surveys may not be required, in addition conditions of the Certificate of Inclusion or the Biological opinion should apply to the project and supersede requirements outlined in this measure intended to protect the species.

**WIL-2c Conduct surveys and avoidance for threatened or endangered riparian birds.** Construction activities shall avoid suitable habitat for listed riparian birds. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS and obtain appropriate take authorizations or permits. SCE shall implement the conservation measures contained within these permits.

If construction activities will occur during the breeding season potentially suitable habitat for listed riparian birds, a qualified biologist shall conduct protocol surveys of the project area and adjacent areas within 500 feet. USFWS protocol surveys shall be conducted for southwestern willow flycatcher, yellow-billed cuckoo, and least Bell's vireo. The surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Where protocol surveys determine that listed riparian birds are present, SCE shall conduct additional focused nest location surveys, to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Protocol surveys, shall be conducted within one year prior to the start of construction and shall continue annually during each nesting season until occupied habitat is established, or as otherwise required by USFWS or through WR-MSHCP participation. ~~completion of construction and restoration activities. At a minimum, surveys shall be conducted from 15 May to 17 July for southwestern willow flycatcher, from 10 April to 31 July for least Bell's vireo, and from 1 June to 31 August for yellow-billed cuckoo.~~

These surveys may be modified through coordination with the USFWS, CDFW, BLM, and the CPUC based on the condition of habitat, the observation of the species, or avoidance of riparian areas during the breeding season. SCE shall submit documentation providing results of the protocol surveys for listed riparian birds to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis or as otherwise required by USFWS, CDFW, or through WR-MSHCP participation, until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review in consultation with USFWS and CDFW.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and ~~1,000~~ 500-foot vertical helicopter disturbance-free buffer shall be established around the active nest and demarcated by fencing or flagging. These buffers may be adjusted in consultation with USFWS and CDFW based on the type of work activity performed. No construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting in the opinion of the qualified nesting bird monitor, construction within 500 feet will discontinue. If construction is to continue, prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while listed riparian birds occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting birds, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site

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cont.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

~~Implementation locations: This mitigation measure applies on BLM lands, throughout the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and within San Bernardino County, and is recommended on all Morongo Tribal Lands.~~

This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's impacts to threatened or endangered riparian birds will be mitigated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.

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DEIR/DEIS Text:

**WIL-2e Conduct surveys and avoidance for coastal California gnatcatcher.** SCE shall conduct proto-col level surveys for coastal California gnatcatchers (CAGN) in all areas of coastal sage scrub habitat that may be affected by the project. Survey areas will include a 500-foot buffer around project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied CAGN habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Surveys shall be conducted by qualified and permitted biologists. Surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for CAGN to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately and the observation will be included in the daily monitoring report. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review on a weekly basis.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while CAGN occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting CAGN, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site
- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

Construction activities shall avoid suitable habitat for CAGN, to the extent feasible. If suit-able habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain appropriate take authorization or permits. SCE shall implement the conservation measures contained within these permits.

**Implementation locations:** This mitigation measure shall apply within San Bernardino County, throughout the WR-MSHCP lands (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands. No suitable CAGN habitat is present in the CV-MSHCP portions of the ROW or on BLM land, so this mitigation measure shall not apply within those areas.

**SCE Comment:**

Participation in the WR-MSHCP as a PSE may result in different mitigation measure requirements. Language added to allow consistency with WR-MSHCP requirements if SCE becomes a PSE:

F3-184



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**F3-184  
cont.**

**WIL-2e Conduct surveys and avoidance for coastal California gnatcatcher.** SCE shall conduct proto-col level surveys for coastal California gnatcatchers (CAGN) in all areas of coastal sage scrub habitat that may be affected by the project, unless otherwise required as a PSE under the WR-MSHCP or CV-MSHCP. Survey areas will include a 500-foot buffer around project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied CAGN habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Surveys shall be conducted by qualified and permitted biologists. Surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for CAGN to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities, or as otherwise required by USFWS or through WR-MSHCP participation.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately and the observation will be included in the daily monitoring report. All active nests shall be monitored on a weekly basis or as otherwise required by USFWS or through WR-MSHCP participation until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review on a weekly basis.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000 500-foot vertical helicopter disturbance-free buffer shall be established around the active nest and demarcated by fencing or flagging. These buffers may be adjusted in consultation with USFWS and CDFW based on type of work activity performed. No construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting in the opinion of the authorized nesting bird monitor, construction within 500 feet will discontinue. If construction is to continue, shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while CAGN occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting CAGN, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site
- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

Construction activities shall avoid suuitable occupied habitat for CAGN, to the extent feasible. If suuitable occupied habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain appropriate take authorization, or permits, and/or PSE Status. SCE shall implement the conservation measures contained within these permits.

**Implementation locations:** This mitigation measure shall apply within San Bernardino County, throughout the WR-MSHCP lands (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands. No suitable CAGN habitat is present in the CV-MSHCP portions of the ROW or on BLM land, so this mitigation measure shall not apply within those areas.



**Comment Set F3: Southern California Edison Company (cont.)**

This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's impacts to CAGN will be mitigated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.

**F3-184**

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.5-55

#### DEIR/DEIS Text:

**WIL-2f Conduct surveys and avoidance for golden eagle.** SCE shall implement the following measures to document golden eagle occurrence in the project area and surrounding mountains. Survey schedule and requirements will be as identified below unless otherwise authorized by the CPUC and BLM in consultation with the USFWS and CDFW.

- **Annual Winter and Nesting Season Surveys.** Beginning at least one year prior to the start of construction, and continuing throughout the construction phase of the project, SCE shall contract with a qualified and permitted biologist to conduct winter season and nesting season surveys of golden eagle habitat use within a 10-mile radius of the project area. Nesting season surveys will determine occupancy, productivity, and chronology of known or newly discovered nesting territories within the 10-mile radius. Survey methods for the inventory shall be either ground-based or helicopter-based, as described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. Winter surveys will evaluate golden eagle occurrence and habitat use within the 10-mile radius during winter.
- **Winter Season Survey Data.** Data collected during winter season surveys shall include dates, times, locations, observation minutes, nest status, and weather conditions during field surveys; panoramic photographs from the survey locations, indicating areas viewed; and compilations of all golden eagle and other raptor observations for each survey date.
- **Nesting Season Inventory Data.** At a minimum, data collected during the nesting season surveys shall include the following: territory status (unknown, vacant, occupied, breeding successful, breeding unsuccessful); nest location, nest elevation; age class of golden eagles observed; nesting chronology; number of young at each visit; photographs; and substrate upon which nest is placed.
- **Determination of Unoccupied Territory Status.** A nesting territory or inventoried habitat shall be considered unoccupied by golden eagles only after completing at least two full surveys in a single breeding season.
- **Monitoring and Adaptive Management Plan.** If an occupied nest (as defined by Pagel et al., 2010) is detected within 10 miles of the project, SCE shall prepare and implement a Golden Eagle Monitoring and Management Plan for the duration of construction to ensure that project construction activities do not result in injury or disturbance to golden eagles. The monitoring shall implement the guidelines described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. The Monitoring and Management Plan shall be implemented upon its approval by CPUC and BLM, in consultation with USFWS and CDFW. Triggers for adaptive management shall include any evidence of project-related disturbance to nesting golden eagles, including but not limited to: agitation behavior (displacement, avoidance, and defense); increased vigilance behavior at nest sites; changes in foraging and feeding behavior, or nest site abandonment. The Monitoring and Management Plan shall include a description of adaptive management actions, to include, but not be limited to, cessation of construction activities that are deemed by a qualified biologist to be the source of golden eagle disturbance.
- **Reporting.** Golden eagle survey data and, if applicable, nest activity monitoring results and any adaptive management actions taken, will be provided to CPUC, BLM, CDFW, and USFWS in monthly monitoring reports, as seasonal data becomes available and if specific nest monitoring or any adaptive management actions are taken, and summarized in annual project monitoring reports.

#### SCE Comment:

This measure has been written for a wind energy project rather than a transmission line project. The following edits to the plan have been made for the following reasons:

- Winter surveys are not required for transmission lines and should be removed from the mitigation measure. (Please consult with Ms. Heather Beeler at USFWS regarding this measure.)
- Transmission line projects are required to perform a 2 mile buffer survey on projects, as recommended by USFWS.
- There is no required permit to performing golden eagle surveys, just a biologist that meets the qualifications of USFWS to perform golden eagle surveys.
- A monitoring and adaptive management plan is not necessary for this project as SCE will implement a 1 mile line of sight, 1/2 mile no line of sight buffer for all active eagle nests as recommended by USFWS.

F3-185

Comment Set F3: Southern California Edison Company (cont.)

Please see below for suggested revisions:

**W1-2f Conduct surveys and avoidance for golden eagle.** SCE shall implement the following measures to avoid impacts to ~~document golden eagle occurrence~~ in the project area and surrounding mountains. Survey schedule and requirements will be as identified below unless otherwise authorized by the CPUC and BLM in consultation with the USFWS and CDFW.

- **Annual ~~Winter and Nesting Season Surveys.~~** Beginning at least one year prior to the start of construction, and continuing throughout the construction phase of the project, SCE shall contract with a qualified ~~and-permitted~~ biologist to conduct ~~winter-season and nesting season~~ surveys of golden eagle habitat use within a ~~240-mile~~ radius of the project area. Nesting season surveys will determine occupancy, productivity, and chronology of known or newly discovered nesting territories within the ~~240-mile~~ radius. Survey methods for the inventory shall be either ground-based or helicopter-based, as described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. ~~Winter surveys will evaluate golden eagle occurrence and habitat use within the 10-mile radius during winter.~~
- **~~Winter Season Survey Data.~~** Data collected during winter-season surveys shall include dates, times, locations, observation minutes, nest status, and weather conditions during field surveys; panoramic photographs from the survey locations, indicating areas viewed; and compilations of all golden eagle and other raptor observations for each survey date.
- **Nesting Season Inventory Data.** At a minimum, data collected during the nesting season surveys shall include the following: territory status (unknown, vacant, occupied, breeding successful, breeding unsuccessful); nest location, nest elevation; age class of golden eagles observed; nesting chronology; number of young at each visit; photographs; and substrate upon which nest is placed.
- **Determination of Unoccupied Territory Status.** A nesting territory or inventoried habitat shall be considered unoccupied by golden eagles only after completing at least two full surveys in a single breeding season.
- **Monitoring and Avoidance Adaptive Management Plan.** If an occupied nest (as defined by Pagel et al., 2010) is detected within 2 miles of the project, SCE shall implement a 1 mile line of sight avoidance buffer, or 1/2 mile non line of sight avoidance buffer for all active eagle nests, as recommended by USFWS. The nest will be monitored weekly when active construction activities occur within 2 miles of the nest. The buffer will be implemented around the occupied nest until a qualified biologist determines the nest is no longer occupied. This buffer may be modified in consultation with CPUC, BLM and USFWS.
- **Monitoring and Adaptive Management Plan.** If an occupied nest (as defined by Pagel et al., 2010) is detected within 10 miles of the project, SCE shall prepare and implement a Golden Eagle Monitoring and Management Plan for the duration of construction to ensure that project construction activities do not result in injury or disturbance to golden eagles. The monitoring shall implement the guidelines described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. The Monitoring and Management Plan shall be implemented upon its approval by CPUC and BLM, in consultation with USFWS and CDFW. Triggers for adaptive management shall include any evidence of project-related disturbance to nesting golden eagles, including but not limited to: agitation behavior (displacement, avoidance, and defense); increased vigilance behavior at nest sites; changes in foraging and feeding behavior, or nest site abandonment. The Monitoring and Management Plan shall include a description of adaptive management actions, to include, but not be limited to, cessation of construction activities that are deemed by a qualified biologist to be the source of golden eagle disturbance.
- **Reporting.** Golden eagle survey data and, if applicable, nest activity monitoring results and any adaptive management actions taken, will be provided to CPUC, BLM, CDFW, and USFWS in monthly monitoring reports, as seasonal data becomes available and if specific nest monitoring or any adaptive management actions are taken, and summarized in annual project monitoring reports.

F3-185  
cont.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.5-56**

**DEIR/DEIS Text:**

**WIL-2g. Conduct surveys and avoidance for burrowing owl**

**Paragraph 2**

"If active burrowing owl burrows are located within project work areas, SCE may passively relocate the owls, outside the nesting season only, by preparing and implementing a Burrowing Owl Passive Relocation Plan, as described below."

An occupied burrow may not be disturbed during the nesting season (generally, but not limited to, February 1 to August 31), unless a qualified biologist determines, by non-invasive methods, that it is not occupied by a mated pair.

**SCE Comment:**

Clarification to burrowing owl relocation methods below.

**Suggested Revision:**

If active burrowing owl burrows are located within project work areas, SCE may passively relocate the owls, outside the nesting season only, by preparing and implementing a Burrowing Owl Passive Relocation Plan, as described below. The active burrowing owl burrow may be relocated during nesting season if a qualified biologist determines, by non-invasive methods, that it is not occupied by a mated pair.

F3-186

**Page D.5-57**

**DEIR/DEIS Text:**

**WIL-2i. Conduct surveys and avoidance for bats.**

**Non-special status bats.**

Any active bat roosts will be identified and clearly marked. An exclusion area will be established 165 feet from any active roost, and these areas will be avoided during construction.

**Conduct surveys and avoidance for bats**

**Special status bats.**

If special-status bat species occur at these roosting/nursery sites, then construction activities shall avoid these sites and a surrounding buffer distance of 300 feet.

**SCE Comment:**

In order to clarify the description of "active bat roost," please make the following revisions:

**WIL-2i. Conduct surveys and avoidance for bats.**

**Non-special status bats.**

Any active bat maternity roosts and occupied hibernaculum will be identified and clearly marked. An exclusion area will be established 165 feet from any active roost, and these areas will be avoided during construction.

**Conduct surveys and avoidance for bats. Special status bats.**

If special-status bat species maternity roosts or occupied hibernaculum occur at these roosting/nursery sites, then construction activities shall avoid these sites and a surrounding buffer distance of 300 feet.

F3-187

**Comment Set F3: Southern California Edison Company (cont.)**

Page D.5-57

F3-188

**DEIR/DEIS Text:**

**WIL-2h Conduct surveys and avoidance for special-status terrestrial herpetofauna.** Biological monitors shall conduct clearance surveys for terrestrial herpetofauna prior to construction each day, monitor construction activities for compliance, and submit monitoring reports to the CPUC and BLM for review on a weekly basis. Following the clearance surveys, either (1) exclusion fencing will be erected or (2) a biological monitor will be on the site during construction activities, to prevent take of special-status herpetofauna. If the installation of exclusion fencing is deemed necessary, the biological monitor shall direct the installation of the fence.

If any terrestrial herpetofauna are found on the construction site, the animal will be allowed to move away from the construction site on its own, or a qualified biologist will relocate it nearby suitable habitat outside the construction area and place it in the shade of a shrub. If potentially suitable burrows or rock piles are found, they will be checked for occupancy. Occupied burrows will be flagged and avoided (employing a 50-foot buffer) during construction. If the burrow cannot be avoided, it will be excavated and the occupant relocated to an unoccupied burrow outside the construction area and of approximately the same size as the one from which it was removed. If an existing burrow is unavailable, the biologist will construct or direct the construction of a burrow of similar shape, size, depth, and orientation as the original.

**SCE Comment:**

This measure should only apply in areas with suitable habitat for special-status terrestrial herpetofauna. The following revisions are suggested:

**WIL-2h Conduct surveys and avoidance for special-status terrestrial herpetofauna.** Biological monitors shall conduct clearance surveys in areas with suitable habitat for special-status terrestrial herpetofauna prior to construction each day, monitor construction activities for compliance, and submit monitoring reports to the CPUC and BLM for review on a weekly basis. Following the clearance surveys, either (1) exclusion fencing will be erected or (2) a biological monitor will be on the site during construction activities, to prevent take of special-status herpetofauna. If the installation of exclusion fencing is deemed necessary, the biological monitor shall direct the installation of the fence.

If any terrestrial herpetofauna are found on the construction site, the animal will be allowed to move away from the construction site on its own, or a qualified biologist will relocate it nearby suitable habitat outside the construction area and place it in the shade of a shrub. If potentially suitable burrows or rock piles are found, they will be checked for occupancy. Occupied burrows will be flagged and avoided (employing a 50-foot buffer) during construction. If the burrow cannot be avoided, it will be excavated and the occupant relocated to an unoccupied burrow outside the construction area and of approximately the same size as the one from which it was removed. If an existing burrow is unavailable, the biologist will construct or direct the construction of a burrow of similar shape, size, depth, and orientation as the original.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.5-59

DEIR/DEIS Text:

**WIL-2j Conduct surveys and avoidance for special-status small mammals.** SCE shall implement pre-construction surveys for special-status small mammals including San Diego black-tailed jackrabbit, northwestern San Diego pocket, pallid San Diego pocket mouse, Palm Springs pocket mouse, Los Angeles pocket mouse, Palm Springs round-tailed ground squirrel, and San Diego desert woodrat in suitable habitats. SCE shall submit documentation providing pre-construction survey results to the CPUC and BLM for review and approval in consultation with CDFW and USFWS. Prior to initiating construction-related activities, SCE shall pre-prepare and implement construction minimization measures and habitat conservation measures for review and approval by CPUC and BLM in consultation with USFWS and CDFW to minimize habitat loss and potential take.

Active woodrat nests that may be occupied by *Neotoma lepida* shall be flagged and ground-disturbing activities shall be avoided within a minimum of 10 feet surrounding each active nest unless otherwise authorized by the CDFW and CPUC. If avoidance is not possible, SCE shall take the following sequential steps: (1) all understory vegetation will be cleared in the area immediately surrounding active nests followed by a period of one night without further disturbance to allow woodrats to vacate the nest, (2) each occupied nest will then be disturbed by a qualified wildlife biologist until all woodrats leave the nest and seek refuge off-site, and (3) the nest sticks shall be removed from the project site and piled at the base of a nearby shrub or tree. Relocated nests shall not be spaced closer than 100 feet apart, unless a qualified wildlife biologist has determined that a specific habitat can support a higher density of nests. SCE shall document all woodrat nests moved in weekly monitoring reports, and will include a written summary in each annual report to the CPUC, BLM, and CDFW. The resumes of the qualified biologists shall be provided to the CPUC and BLM (as appropriate) for concurrence.

**Implementation locations:** This mitigation measure shall apply within San Bernardino County, on BLM lands, within the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands.

SCE Comment:

To clarify the instance of the San Diego desert Woodrat, please make the following revision:

**WIL-2j Conduct surveys and avoidance for special-status small mammals.** SCE shall implement pre-construction surveys for special-status small mammals including San Diego black-tailed jackrabbit, northwestern San Diego pocket, pallid San Diego pocket mouse, Palm Springs pocket mouse, Los Angeles pocket mouse, Palm Springs round-tailed ground squirrel, and San Diego desert woodrat in suitable habitats. SCE shall submit documentation providing pre-construction survey results to the CPUC and BLM for review and approval in consultation with CDFW and USFWS. Prior to initiating construction-related activities, SCE shall pre-prepare and implement construction minimization measures and habitat conservation measures for review and approval by CPUC and BLM in consultation with USFWS and CDFW to minimize habitat loss and potential take.

Active woodrat nests that may be occupied by San Diego desert woodrat (*Neotoma lepida intermedia*) shall be flagged and ground-disturbing activities shall be avoided within a minimum of 10 feet surrounding each active nest unless otherwise authorized by the CDFW and CPUC. If avoidance is not possible, SCE shall take the following sequential steps: (1) all understory vegetation will be cleared in the area immediately surrounding active nests followed by a period of one night without further disturbance to allow woodrats to vacate the nest, (2) each occupied nest will then be disturbed by a qualified wildlife biologist until all woodrats leave the nest and seek refuge off-site, and (3) the nest sticks shall be removed from the project site and piled at the base of a nearby shrub or tree. Relocated nests shall not be spaced closer than 100 feet apart, unless a qualified wildlife biologist has determined that a specific habitat can support a higher density of nests. SCE shall document all woodrat nests moved in weekly monitoring reports, and will include a written summary in each annual report to the CPUC, BLM, and CDFW. The resumes of the qualified biologists shall be provided to the CPUC and BLM (as appropriate) for concurrence. The San Diego desert woodrat is a covered species under the WR-MSHCP. If SCE becomes a PSE under the WR-MSHCP, woodrat nest avoidance would be implemented where practicable, however, this mitigation would not be required, as is consistent with the WR-MSHCP.

**Implementation locations:** This mitigation measure shall apply within San Bernardino County, on BLM lands, within the WR-MSHCP (only if SCE does not obtain PSE status), and CV-MSHCP areas (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands

F3-189

Comment Set F3: Southern California Edison Company (cont.)

Page D.5-59

DEIR/DEIS Text:

WIL-2k. Conduct surveys and avoidance for American badger, ringtail, and desert kit fox.

Active dens shall be flagged and project activities within 200 feet (non-natal dens) or 500 feet (natal dens, or any active den during the breeding season) shall be avoided.

SCE Comment:

200 feet and 500 feet are excessive buffers. Recent projects have successfully implemented a 100ft buffer. SCE suggests the following revisions:

WIL-2k. Conduct surveys and avoidance for American badger, ringtail, and desert kit fox.

Active dens shall be flagged and project construction activities within 200 feet (non-natal dens) or 500 100 feet (non-natal den, natal dens, or any active den during the breeding season) shall be avoided. Ingress/egress of construction equipment through buffers and low intensity activities such as BMP maintenance shall be exempt from the buffer restrictions.

F3-190

Page D.5-60

DEIR/DEIS Text:

WIL-2k: Conduct surveys and avoidance for American badger, ringtail, and desert kit fox

Paragraph 4

**Active and potentially active non-natal dens.** Outside the breeding season, any potentially active dens that would be directly impacted by construction activities shall be monitored by a qualified mammalogist or biologist for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den may be excavated and backfilled by hand. If tracks are observed, the den may be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage continued use. After verification that the den is no longer active, the den may be excavated and back-filled by hand.

SCE Comment:

For additional clarification, please make the following revision::

**Active and potentially active non-natal dens.** Outside the breeding season, any potentially active dens that would be directly impacted by construction activities shall be monitored by a qualified mammalogist or biologist for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den may be excavated and backfilled by hand. If tracks are observed, the den may be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) or a one-way door installed over the den entrance for the next three to five nights to discourage continued use. After verification that the den is no longer active, the den may be excavated and back-filled by hand.

F3-191



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.5-83

DEIR/DEIS Text:

<b>Table D.5-6. Mitigation Monitoring Program – Biological Resources, Wildlife Effectiveness Criteria</b>	Avoid take of desert tortoise.
<b>Responsible Agency</b>	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
<b>Timing</b>	Within 14 days prior to construction, and during construction.
<b>MITIGATION MEASURE</b>	<b>WIL-2b: Prepare and implement Raven Monitoring, Management, and Control Plan (full text in Section D.5.3.3)</b>
<b>Location</b>	All areas with suitable desert tortoise habitat.
<b>Monitoring / Reporting Action</b>	SCE submits a Raven Monitoring, Management, and Control Plan; CPUC/BLM monitor approves report format and contents in consultation with CDFW and USFWS.
<b>Effectiveness Criteria</b>	Minimize project-related predator subsidies and prevent increases in raven numbers or activity within desert tortoise habitat.
<b>Responsible Agency</b>	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
<b>Timing</b>	Prior to the start of construction, and during construction, restoration, and O&M phases.

**SCE Comment:**

The raven nesting opportunities currently present on the WOD corridor would be reduced by the Proposed Project. Implementation of this plan during construction and post-construction restoration along with the payment into the USFWS Regional Raven Management Program will more than adequately reduce the potential impact to less than significant without requiring this plan to apply to O&M activities.

Please make the following revision:

<b>Table D.5-6. Mitigation Monitoring Program – Biological Resources, Wildlife Effectiveness Criteria</b>	Avoid take of desert tortoise.
<b>Responsible Agency</b>	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
<b>Timing</b>	Within 14 days prior to construction, and during construction.
<b>MITIGATION MEASURE</b>	<b>WIL-2b: Prepare and implement Raven Monitoring, Management, and Control Plan (full text in Section D.5.3.3)</b>
<b>Location</b>	All areas with suitable desert tortoise habitat.
<b>Monitoring / Reporting Action</b>	SCE submits a Raven Monitoring, Management, and Control Plan; CPUC/BLM monitor approves report format and contents in consultation with CDFW and USFWS.
<b>Effectiveness Criteria</b>	Minimize project-related predator subsidies and prevent increases in raven numbers or activity within desert tortoise habitat.
<b>Responsible Agency</b>	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
<b>Timing</b>	Prior to the start of construction, and during construction, <u>and</u> restoration, <u>and</u> O&M phases.

F3-192



## Responses to Comment Set F3 – Section D.5 Biological Resources – Wildlife

F3-172 The commenter states that there is no natural nesting golden eagle habitat present within 4 miles of Segment 2. Golden eagles historically nested in the Box Springs Mountains. Although nesting has not been observed in recent years, habitat is present and could be occupied by nesting golden eagles. Portions of the Box Springs Mountains are within 4 miles of Segment 2. No revisions to the Final EIS were made.

F3-173 The commenter states that there is no natural nesting golden eagle habitat present within 4 miles of Segment 3. Please see Response to Comment F3-172. Portions of the Box Springs Mountains are within 4 miles of Segment 3.

F3-174 The commenter states that the EIS should note that all California Natural Diversity Database (CNDDB) records for Sierra Madre (mountain) yellow-legged frog are listed as extirpated or potentially extirpated.

Regarding the Sierra Madre (mountain) yellow-legged frog, Section D.5.3.3.2 of the Draft EIR/EIS states, "The U.S. Geological Survey has done exhaustive surveys to locate any remaining populations of this species and none have been reported from the project area. There is no suitable habitat in the project area for Sierra Madre yellow-legged frog, and no impacts are expected." The text has not been revised.

F3-175 The commenter states that the Draft EIR/EIS should note that all CNDDB records for Sierra Madre (mountain) yellow-legged frog are listed as extirpated or potentially extirpated. Please see Response to Comment F3-174.

F3-176 a. The commenter states that a 500-foot survey buffer for most wildlife and some project features is unreasonable, and it may not be possible to complete pre-construction surveys within a 500-foot buffer of existing access roads within 10 days of construction.

Mitigation Measure WIL-1a (Conduct pre-construction biological resources surveys) requires that qualified biologists perform pre-construction biological surveys at each project work area and access route, and in the 500-foot area surrounding each work site or access route. Text of Mitigation Measure WIL-1a has been revised in the Final EIS to state that survey buffers will vary, as appropriate, based on target species and as stipulated by project work plans and mitigation plans, but will be no less than 300 feet surrounding each work site and access route being improved. The survey distance will be 100 feet surrounding other access routes or access routes that have been improved. Where suitable nest sites for raptors are present, the pre-construction surveys for raptor nests will extend to a 500-foot area surrounding the work area.

b. The commenter states that only access roads that require heavy road improvement will have pre-construction surveys. Access roads will not be surveyed if they are only being used to travel between work areas.

Sensitive biological resources may be located adjacent to or within the boundaries of access roads, including roads that would not be improved for the project. Some examples are special-status plants, bird nests in adjacent or overhanging vegetation or on the ground, burrowing owl burrows, and desert tortoise burrows. Without pre-construction surveys to identify these resources and establish protective buffers, or take other measures as appropriate, these resources could be impacted. Mitigation Measure WIL-1a requires pre-

construction surveys of access roads, including those that are only being used to travel between work areas. The measure was not revised in response to this comment's suggestion.

- F3-177 The commenter requests revisions to Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) to make the requirement for daily inspections of wildlife exclusion netting consistent with the project's Nesting Bird Management Plan (NBMP). The text of Mitigation Measure WIL-1b has been revised in the Final EIS to require inspections of wildlife netting installed within established material yards to be conducted at least once daily.
- F3-178 The commenter requests that Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) be revised to state that dead animals found only on unpaved project roads require a report to animal control agencies or CDFW. The text of Mitigation Measure WIL-1b has been revised in the Final EIS to state that dead animals found only on unpaved project roads require a report to animal control agencies or CDFW.
- F3-179 The commenter states that SCE should only be responsible for project-related wildlife injuries. Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) requires SCE to create and implement guidelines for dealing with injured wildlife found on or near project roads, work areas, or the ROW, and to bear the costs of veterinary treatment or wildlife rehabilitation for the injured animal. While it is acknowledged that SCE should only be responsible for project-related wildlife injuries, if an injured wild animal is found on or near project roads or work areas, it may be difficult to determine if the injuries were project-related. Text of Mitigation Measure WIL-1b has been revised in the Final EIS to exclude from this requirement any injured wildlife whose injuries are clearly not project-related, as determined by a qualified biologist.
- F3-180 The commenter states that the mitigation requirement to prepare and implement rattlesnake guidelines does not mitigate a specific significant impact and WEAP training regarding rattlesnakes is sufficient. Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) requires SCE to create and implement guidelines for dealing with rattlesnakes found in or near project work areas and access roads. As a venomous reptile that tends to coil and buzz when startled, rather than flee, rattlesnakes are much more likely than other wildlife on the project to be intentionally harmed or killed, and also pose a serious safety hazard to personnel.
- The red-diamond rattlesnake, a California Species of Special Concern, is present on Segments 3 through 6 of the project, and has a moderate potential to occur on Segments 1 and 2. If a rattlesnake hibernaculum is present in a work area, there is the potential to impact a large number of individuals in a single location. Having rattlesnake guidelines in place will provide direction to personnel in the appropriate response to rattlesnakes, decrease the likelihood that rattlesnakes will be intentionally harmed or killed, and help to avoid and minimize direct impacts to a special-status rattlesnake species. The measure was not revised.
- F3-181 The commenter requests revisions to mitigation measure to avoid conflicts with the Nesting Bird Management Plan (NBMP), addition of default nest buffers in the event that the NBMP is not approved prior to the start of construction or pre-construction activities, and a refinement of the specified nesting survey dates.

Mitigation Measure WIL-1c (Prepare and implement a Nesting Bird Management Plan) requires preparation of a project-specific NBMP and specifies the contents and requirements of that NBMP. In order to ensure timely completion of the NBMP, CPUC and SCE convened a technical working group (TWG) of SCE, BLM, CPUC, CDFW, and USFWS biologists to prepare the NBMP. The TWG held a series of meetings to outline the necessary NBMP contents, and then to review and revise several working draft versions of the NBMP. The final NBMP is appended to the Final EIS as Appendix 14. The final NBMP reflects the input and discussion of each TWG member to effectively manage nesting birds. The final NBMP includes some minor departures from Mitigation Measure WIL-1c as presented in the Draft EIR/EIS. Text of Mitigation Measure WIL-1c has been revised in the Final EIS to add default nest buffers and ensure conformance with the NBMP.

The breeding period listed in Mitigation Measure WIL-1c (January 1 to August 31) is appropriate, as some species (e.g., raptors, hummingbirds) begin nesting and breeding activities early.

F3-182 The commenter requests revisions to mitigation regarding ravens because the proposed project would reduce raven nesting opportunities, and potential impacts would be reduced to less than significant without requiring the Raven Management Plan to apply to O&M activities.

Newly constructed transmission towers may provide artificial perches and nest sites for ravens, which prey on young desert tortoises. The Proposed Project would result in a net decrease in the overall number of transmission structures in desert tortoise habitat, but most of the new towers would be steel lattice, whereas many of the existing structures to be removed are wooden "H-frame" design. Steel lattice towers provide more horizontal and diagonal surfaces that can support raven nesting and perching. Due to these design differences, the Proposed Project would increase the availability of suitable raven nesting and perching sites. The portion of the Proposed Project route within desert tortoise habitat is near the I-10 Freeway, where numerous other structures are present that provide raven nesting opportunities.

Mitigation Measure WIL-2b (Prepare and implement raven monitoring, management, and control plan) requires implementation of a plan to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat. Mitigation Measure WIL-2b also requires a one-time payment to the U.S. Fish and Wildlife Service (USFWS) Regional Raven Management Program.

The transmission towers will provide increased raven nesting and perching opportunities throughout the life of the project and the Raven Management Plan is therefore required during the O&M phase. The requested revisions were not made.

The commenter states that acreage impacts for calculation of payment to the USFWS Regional Raven Management Program should only apply in suitable desert tortoise habitat.

Mitigation Measure WIL-2b (Prepare and implement raven monitoring, management, and control plan) requires a one-time payment to the USFWS Regional Raven Management Program and this payment is calculated based on long-term or permanent project disturbance. It is acknowledged that this payment should apply to long-term or permanent project disturbance within the geographic range of the desert tortoise. Text of Mitigation Measure

WIL-2b has been revised in the Final EIS to state that that this payment should apply to long-term or permanent project disturbance within the geographic range of the desert tortoise.

The commenter states that Mitigation Measure WIL-2b should not apply to the portion of the project within the Coachella Valley MSHCP if SCE becomes a participating special entity in the MSHCP.

Mitigation Measure WIL-2b (Prepare and implement raven monitoring, management, and control plan) would require management of common ravens on the ROW, within the geographic range of the desert tortoise. The Coachella Valley MSHCP identifies raven management as strategy for desert tortoise conservation within the plan area, but raven control and management have not been implemented under the plan. Therefore, Mitigation Measure WIL-2b is necessary to mitigate the project's effects of raven nest site subsidies and potential raven predation on desert tortoise, as described in Impact WIL-2.

- F3-183 The commenter requests revisions to Mitigation Measure WIL-2c (Conduct surveys and avoidance for threatened or endangered riparian birds) to ensure consistency with USFWS guidance and MSHCP requirements regarding surveys and avoidance for threatened or endangered riparian birds.

Mitigation Measure WIL-2c would require agency protocol field surveys and avoidance for listed threatened or endangered birds. If suitable habitat cannot be avoided, SCE is to consult with CDFW and USFWS and obtain appropriate take authorizations or permits and then implement the conservation measures contained within these permits. Habitat loss and consequent take of these birds are covered under the Western Riverside County MSHCP. However, Mitigation Measure WIL-2c would mitigate impacts, by minimizing project effects to nesting territories. The requested revision was not made.

The surveys and avoidance would mitigate the project's potential impacts to listed species. The requested revision was not made.

- F3-184 The commenter requests revisions to Mitigation Measure WIL-2e to ensure consistency with MSHCP requirements regarding surveys and avoidance for coastal California gnatcatcher.

Mitigation Measure WIL-2e (Conduct Surveys and avoidance for coastal California gnatcatcher) would require agency protocol field surveys and avoidance for the listed threatened California gnatcatcher. Habitat loss and consequent take of California gnatcatcher are covered under the Western Riverside County MSHCP. However, Mitigation Measure WIL-2e would mitigate impacts, by minimizing project effects to occupied habitat and nesting territories. The text of Mitigation Measure WIL-2e was revised in the Final EIS to clarify that no construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads. Other requested revisions were not made.

- F3-185 The commenter requests revisions to Mitigation Measure WIL-2f regarding surveys and avoidance for golden eagle because winter surveys are not required for transmission line projects, a 2-mile survey buffer is recommended by USFWS, permits are not required to perform golden eagle surveys, and a monitoring and adaptive management plan is not needed as SCE will implement a one mile line-of-sight and one-half mile no line-of-sight buffer for active eagle nests as recommended by USFWS.

After consultation with USFWS, it was confirmed that the requested revisions are consistent with USFWS direction. The text of Mitigation Measure WIL-2f (Conduct surveys and avoidance for golden eagle) in the Final EIS has been revised to remove the requirement for winter surveys, reduce the survey buffer to 2 miles on either side of the transmission line, delete the permit requirement, and remove the requirement for a monitoring and adaptive management plan. A requirement for a one mile line-of-sight and one-half mile no line-of-sight buffer for active eagle nests has been added to Mitigation Measure WIL-2f.

- F3-186 The commenter suggests minor revisions to Mitigation Measure WIL-2g, addressing burrowing owl mitigation, to clarify that relocation of burrowing owls during nesting season is allowed if a qualified biologist determines that the burrow is not occupied by a mated pair.

Mitigation Measure WIL-2g (Conduct surveys and avoidance for burrowing owl) allows passive relocation of burrowing owls during breeding season if a qualified biologist determines that an occupied burrow is not occupied by a mated pair. However, language earlier in the measure indicates that relocation may only be done outside of the breeding season. Mitigation Measure WIL-2g has been revised in the Final EIS to resolve this conflict and clarify that relocation during breeding season is permissible under the conditions noted above.

- F3-187 The commenter requests minor revisions to Mitigation Measure WIL-2i to clarify the definition of "active bat roost." Mitigation Measure WIL-2i (Conduct surveys and avoidance for bats) specifies avoidance buffers for active bat roosts. Mitigation Measure WIL-2i has been revised in the Final EIS to define active bat roosts as occupied day roosts, maternity roosts, and hibernacula.

- F3-188 The commenter requests minor revision to Mitigation Measure WIL-2h to clarify that clearance surveys for terrestrial herpetofauna are required only in areas with suitable habitat. The intent of Mitigation Measure WIL-2h (Conduct surveys and avoidance for special-status terrestrial herpetofauna) is to require surveys only in areas with suitable habitat. Text of Mitigation Measure WIL-2h has been revised in the Final EIS to state that surveys are required in areas with suitable habitat.

- F3-189 The commenter requests revisions to Mitigation Measure WIL-2j to specify that it applies only to active woodrat nests that may be occupied by San Diego desert woodrat and that this mitigation does not apply within the Western Riverside County MSHCP area.

Mitigation Measure WIL-2j (Conduct surveys and avoidance for special-status small mammals) requires salvage and relocation of desert woodrat nests. It cannot be determined from the nest which woodrat species is present, and the range boundaries and taxonomy of desert woodrat in the project area are currently unclear. Even nests not currently occupied by San Diego desert woodrat are important habitat components that may be occupied in the future. Therefore, Mitigation Measure WIL-2j requires salvage and relocation of all desert woodrat nests to ensure that impacts to San Diego desert woodrat are avoided and minimized.

Habitat loss and take of individual San Diego desert woodrat are covered under the Western Riverside County MSHCP. However, Mitigation Measure WIL-2j would mitigate impacts to San Diego desert woodrat, by minimizing loss of important habitat components (i.e., nests) and minimizing take of individual woodrats. The requested revision was not made.

- F3-190 The commenter suggests revisions to Mitigation Measure WIL-2k to reduce avoidance buffers for badger, ringtail, and desert kit fox and allow ingress/egress of construction equipment and low intensity activities to take place within buffers. Comment states that the buffers required by Mitigation Measure WIL-2k (200 feet for non-natal dens and 500 feet for natal dens, or any active den during the breeding season) are excessive and recent projects have successfully implemented 100-foot buffers.
- Mitigation Measure WIL-2k (Conduct surveys and avoidance for American badger, ringtail, and desert kit fox) requires establishment of buffers around active natal and non-natal dens. It is acknowledged that recent projects have successfully implemented 100-foot buffers. After reviewing mitigation requirements for similar projects, it was concluded that a 100-foot buffer is adequate to protect non-natal dens. Text of Mitigation Measure WIL-2k in the Final EIS has been revised to implement 100-foot buffers for non-natal dens. The 500-foot buffer for natal dens was not revised.
- The text of Mitigation Measure WIL-2k in the Final EIS has also been revised to specify that ingress/egress and low intensity activities may take place within buffers if a qualified biologist determines that these activities will not impact the den or denning animals.
- F3-191 The commenter suggests revision to Mitigation Measure WIL-2k to allow use of a one-way door installed over the den entrance.
- Mitigation Measure WIL-2k (Conduct surveys and avoidance for American badger, ringtail, and desert kit fox) allows natural materials to be used to progressively block the entrance of an active non-natal den over three to five nights to discourage continued use. Installation of a one-way door would immediately prevent access to the den and would not accomplish the required objective of gradual discouragement. The requested revision was not made.
- F3-192 The commenter states that potential project impacts due to raven subsidies would be reduced to less than significant without requiring the raven plan to apply to O&M activities. Please see Response to Comment F3-182.

## Comment Set F3: Southern California Edison Company (cont.)

### Section D.6 Climate Change

#### Page D.6-9 through 10

##### DEIR/DEIS Text:

The non-recurring construction emissions applied over the anticipated 30-year service life of the Proposed Project results in an average rate of roughly 1,600 MTCO<sub>2</sub>e per year. This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011).

##### SCE Comment:

The SCAQMD GHG threshold of 10,000 MTCO<sub>2</sub>e/yr is should be compared to construction GHG emissions amortized over 30 years and added to operational GHG emissions, in order to represent an annual amortization of total GHG emissions.

The DEIR currently compares only amortized construction emissions to the 10,000 MTCO<sub>2</sub>e/yr threshold, then also compares estimated operational emissions to the threshold separately.

SCE recommends adding amortized construction emissions to annual operational emissions, and comparing the total to the SCAQMD threshold (i.e. 1,600 + 49).

F3-193

#### Page D.6-9

##### DEIR/DEIS Text:

This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011).

##### SCE Comment:

SCE concurs that no mitigation is necessary to minimize GHG emissions. However, it may be beneficial to point out that Air Quality Mitigation Measures AQ-1b and AQ-1c would also reduce GHG emissions. The following language is suggested:

This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011). Furthermore, Air Quality Mitigation Measures AQ-1b, Control Off-Road Equipment Emissions and AQ-1c, Control Helicopter Emissions, which were intended to minimize criteria pollutant emissions, would also reduce GHG emissions during construction.

F3-194



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.6-10**

**DEIR/DEIS Text:**

Table D.6-4. Operation-Related GHG Emissions (MTCO<sub>2</sub>e/yr)

**Table D.6-4. Operation-Related GHG Emissions (MTCO<sub>2</sub>e/yr)**

Source	SF6	Total CO <sub>2</sub> e
SF6 Losses from Circuit Breakers	25	25
Maintenance Trucks	—	1
Helicopters	—	9
Pickup Trucks	—	2
Boom/Crane Trucks	—	12
Operations and Maintenance	25	49

**SCE Comment:**

Recommend revising “SF6” from the “Source” row of Table D.6-4 to read “SF6 as CO<sub>2</sub>e” for clarity.

**Table D.6-4. Operation-Related GHG Emissions (MTCO<sub>2</sub>e/yr)**

Source	SF6 <u>as CO<sub>2</sub>e</u>	Total CO <sub>2</sub> e
SF6 Losses from Circuit Breakers	25	25
Maintenance Trucks	—	1
Helicopters	—	9
Pickup Trucks	—	2
Boom/Crane Trucks	—	12
Operations and Maintenance	25	49

**Page D.6-15 through D.6-17**

**DEIR/DEIS Text:**

**D.6.4.3 Phased Build Alternative**

Impact GHG-1, GHG-2

**SCE Comment:**

As explained in SCE’s accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional emissions impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

F3-195

F3-196



### Responses to Comment Set F3 – Section D.6 Climate Change

- F3-193 The comment recommends adding the amortized construction emissions to the annual operational emissions for comparison with SCAQMD thresholds. No revision is necessary as the separate phases do not overlap, and if they were presumed to be, the resulting sums would also be well below the threshold.
- F3-194 The commenter notes that while no mitigation measures are needed to minimize GHG, the beneficial effects of GHG reductions through Mitigation Measures AQ-1b (Control off-road equipment emissions) and AQ-1c (Control helicopter emissions) should be acknowledged. A sentence to this effect is added in Section D.6.3.3 (Climate Change, Impacts and Mitigation Measures).
- F3-195 The commenter recommends a clarification in Table D.6-4 (Operation-Related GHG Emissions (MTCO<sub>2</sub>e/yr)) that SF<sub>6</sub> emission rates have been converted to CO<sub>2</sub> equivalent, so that SF<sub>6</sub> appears in the units of CO<sub>2</sub>e. This change has been made.
- F3-196 The commenter states that there are additional impacts associated with the Phased Build Alternative that were not addressed in the Draft EIR/EIS. Please see General Response GR-4.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.7 Cultural Resources

Page D.7-1

DEIR/DEIS Text:

First paragraph

..., along with archaeological survey and evaluation reports prepared on SCE's behalf by LSA Associates, Inc. (LSA) and ASM Affiliates (ASM).

SCE Comment:

Please change for accuracy:

along with archaeological survey and evaluation reports prepared on SCE's behalf by LSA Associates, Inc. (LSA) and ASM Affiliates (ASM), and SCE.

F3-197

Page D.7-2

DEIR/DEIS Text:

3<sup>rd</sup> Paragraph

ASM 2014

SCE Comment:

Please correct this citation:

AMS-2014 DeCarlo and Winslow, 2015a

F3-198

Page D.7-2

DEIR/DEIS Text:

4<sup>th</sup> Paragraph

surface observations and using intensive archival research

SCE Comment:

Please correct the methods and citations:

surface observations, using intensive archival research and/or test excavations (DeCarlo and Winslow 2015a, 2015b, 2015c; LSA and Williams 2014; Williams and Belcourt 2015)

F3-199

Page D.7-3

DEIR/DEIS Text:

2<sup>nd</sup> Paragraph

(McLean et al. 2013 and ASM, 2014)

SCE Comment:

Please correct the citations:

(McLean et al., 2013 ~~and ASM, 2014~~ DeCarlo and Winslow, 2015a, 2015b, 2015c; LSA and Williams, 2014; Williams and Belcourt, 2015)

F3-200

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.7-3**

**DEIR/DEIS Text:**

Throughout this section:  
Williams and Belcourt (2014)

**F3-201**

**SCE Comment:**

In the DEIR/DEIS, the citation is used as the primary citation from pages 3-10. Because Williams and Belcourt are not the primary authors of the information provided, SCE recommends adding primary references as used in Williams and Belcourt. The next 41 comments add the primary references.

**Page D.7-3**

**DEIR/DEIS Text:**

10,000 years of human cultural development and environmental adaptation. For the Colorado Desert region, resolution of chronological sequencing, the general rarity of cultural deposits dating to the archaic periods, the abundance of diversity of adaptive patterns and the chronology of occupation associated with Lake Cahuilla are issues that challenge modern researchers (Williams and Belcourt, 2014:7).

**F3-202**

**SCE Comment:**

Please revise as follows:

10,000 years of human cultural development and environmental adaptation. (Crabtree 1981; Warren 1984; Schaefer 1994; Schaefer and Laylander 2007; Sutton et al. 2007). For the Colorado Desert region, resolution of chronological sequencing, the general rarity of cultural deposits dating to the archaic periods, the abundance of diversity of adaptive patterns and the chronology of occupation associated with Lake Cahuilla are issues that challenge modern researchers (Williams and Belcourt, 2014:7).

**Page D.7-3**

**DEIR/DEIS Text:**

However, an Early Pleistocene occupation of the California deserts has not been demonstrated, and current consensus recognizes Clovis as the earliest cultural complex represented (Williams and Belcourt, 2014:7).

**F3-203**

**SCE Comment:**

Please revise as follows:

However, an Early Pleistocene occupation of the California deserts has not been demonstrated, and current consensus recognizes Clovis as the earliest cultural complex represented (Williams and Belcourt, 2014:7). (Moratto 1984).

**Page D.7-3**

**DEIR/DEIS Text:**

Approximately 12,000–7000 before present (BP) during the Early Holocene, the area between San Bernardino and San Geronio Pass was occupied by Native American people.

**F3-204**

**SCE Comment:**

Please revise as follows:

Approximately 12,000–7000 before present (BP) during the Early Holocene, the area between San Bernardino and San Geronio Pass was occupied by Native American people (Moratto 1984:110–113).

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.7-3**

**DEIR/DEIS Text:**

The occurrence of extremely large and occasionally fluted bifaces associated with the use of the spear and atlatl marks sites from this time (Williams and Belcourt, 2014:7).

**SCE Comment:**

Please revise as follows:

The occurrence of extremely large and occasionally fluted bifaces associated with the use of the spear and atlatl marks sites from this time (~~Williams and Belcourt, 2014:7~~) (Moratto 1984:81).

F3-205

**Page D.7-3**

**DEIR/DEIS Text:**

In general, the WPLT toolkit commonly includes crescentics, large flake and core scrapers, choppers, scraper planes, hammerstones, different core types, drills, and graters. A primary characteristic of WPLT sites is their location on the shores of pluvial lakes from northern central California to southern California. The Lake Mojave Complex is one of the best known expressions of the WPLT (Williams and Belcourt, 2014:7, 9).

**SCE Comment:**

Please revise as follows:

In general, the WPLT toolkit commonly includes crescentics, large flake and core scrapers, choppers, scraper planes, hammerstones, different core types, drills, and graters (Moratto 1984:93). A primary characteristic of WPLT sites is their location on the shores of pluvial lakes from northern central California to southern California (Moratto 1984:81, 103). The Lake Mojave Complex is one of the best known expressions of the WPLT (~~Williams and Belcourt, 2014:7, 9~~).

F3-206

**Page D.7-4**

**DEIR/DEIS Text:**

comparative unit for Early Man in the Mojave Desert.

**SCE Comment:**

Please revise as follows:

comparative unit for Early Man in the Mojave Desert (Warren and Crabtree 1986:184).

F3-207

**Page D.7-4**

**DEIR/DEIS Text:**

Flaked stone artifacts include large stemmed Lake Mojave and Silver Lake projectile points, leaf-shaped bifaces, bifacial cores, crescentics, domed and keeled scrapers, shaft straighteners, and large core-cobble tools (Williams and Belcourt, 2014:9).

**SCE Comment:**

Please revise as follows:

Flaked stone artifacts include large stemmed Lake Mojave and Silver Lake projectile points, leaf-shaped bifaces, bifacial cores, crescentics, domed and keeled scrapers, shaft straighteners, and large core-cobble tools (~~Williams and Belcourt, 2014:9~~) (Hall 1993:19; Horne and McDougall 1997:9).

F3-208

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.7-4**

**DEIR/DEIS Text:**

Pinto cultural complex has been demonstrated.

**F3-209**

**SCE Comment:**

Please revise as follows:

Pinto cultural complex has been demonstrated (Crabtree 1981:40; Sutton et al. 2007:238).

**Page D.7-4**

**DEIR/DEIS Text:**

indicate an increased reliance on seed processing

**F3-210**

**SCE Comment:**

Please revise as follows:

indicate an increased reliance on seed processing (Hall 1993:21; Horne and McDougall 1997:9)

**Page D.7-4**

**DEIR/DEIS Text:**

before 7000 years B.P., before the onset of severe Middle Holocene desiccation (Williams and Belcourt, 2014:9, 10).

**F3-211**

**SCE Comment:**

Please revise as follows:

before 7000 years B.P., before the onset of severe Middle Holocene desiccation (~~Williams and Belcourt, 2014:9, 10~~)(Sutton et al. 2007)

**Page D.7-4**

**DEIR/DEIS Text:**

Both lacustrine and terrestrial biotic economic resources were also identified (Williams and Belcourt, 2014: 10).

**F3-212**

**SCE Comment:**

Please revise as follows:

Both lacustrine and terrestrial biotic economic resources were also identified (~~Williams and Belcourt, 2014:10~~); (McDonald 1992:131).

**Page D.7-4**

**DEIR/DEIS Text:**

Milling equipment in the assemblage consists mostly of broken and fire-affected manos and metates that were often recycled as hammerstones, cooking stones, and as construction material in cache pits and hearths (Williams and Belcourt, 2014: 10).

**F3-213**

**SCE Comment:**

Please revise as follows:

Milling equipment in the assemblage consists mostly of broken and fire-affected manos and metates that were often recycled as hammerstones, cooking stones, and as construction material in cache pits and hearths (~~Williams and Belcourt, 2014:10~~); (McDonald 1992:240).

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page D.7-4

##### DEIR/DEIS Text:

northern margins of the Lake Cahuilla basin going back at least 3,000 years (Williams and Belcourt, 2014: 10, 11).

F3-214

##### SCE Comment:

Please revise as follows:

northern margins of the Lake Cahuilla basin going back at least 3,000 years (~~Williams and Belcourt, 2014: 10, 11).~~  
(Love and Dahdul 2002)

#### Page D.7-5

##### DEIR/DEIS Text:

transition zone occupied by both the Cahuilla and Luiseño. During the ethnohistoric period, the Serrano were also present in the San Geronio Pass, and the Cahuilla were present in the San Jacinto Valley and San Timoteo Canyon (Williams and Belcourt, 2014: 11).

F3-215

##### SCE Comment:

Please revise as follows:

transition zone occupied by both the Cahuilla and Luiseño (Bean and Vane 1978). During the ethnohistoric period, the Serrano were also present in the San Geronio Pass, and the Cahuilla were present in the San Jacinto Valley and San Timoteo Canyon (~~Williams and Belcourt, 2014: 11).~~

#### Page D.7-5

##### DEIR/DEIS Text:

The Cahuilla, Luiseño, and Serrano, are Takic-speaking people of the Uto-Aztec linguistic stock. The Cahuilla and Luiseño are of the Cupan sub-group, while the Serrano (and Gabrielino) are of the Serrano-Gabrielino sub-group. Before the more recent Takic linguistic grouping, the Cahuilla, Luiseño, Gabrielino, and Serrano were included within the southern Californian branch of the Shoshonean family. Cahuilla, Serrano, and Luiseño settlement patterns and culture are further addressed in the following Ethno-graphic section (Williams and Belcourt, 2014: 11).

F3-216

##### SCE Comment:

Please revise as follows:

The Cahuilla, Luiseño, and Serrano, are Takic-speaking people of the Uto-Aztec linguistic stock (Bean and Vane 1979, Miller 1984). The Cahuilla and Luiseño are of the Cupan sub-group, while the Serrano (and Gabrielino) are of the Serrano-Gabrielino sub-group (Miller 1984). Before the more recent Takic linguistic grouping, the Cahuilla, Luiseño, Gabrielino, and Serrano were included within the southern Californian branch of the Shoshonean family by Kroeber (1907, 1925). Cahuilla, Serrano, and Luiseño settlement patterns and culture are further addressed in the following Ethno-graphic section (Williams and Belcourt, 2014: 11).

#### Page D.7-5

##### DEIR/DEIS Text:

Speakers of the Uto-Aztec family were located in the Great Basin, southern California, and an area stretching from southern Arizona into northwest and central Mexico

F3-217

##### SCE Comment:

Please revise as follows:

Speakers of the Uto-Aztec family were located in the Great Basin, southern California, and an area stretching from southern Arizona into northwest and central Mexico (Miller 1984).

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-5

DEIR/DEIS Text:

Additionally, after A.D. 1600, the desiccation of Lake Cahuilla resulted in an intensification of land use in the San Geronio Pass, the San Jacinto Plain, and Perris Valley regions that was reflected into the ethnohistoric period (Williams and Belcourt, 2014: 11, 12).

SCE Comment:

Please revise as follows:

Additionally, after A.D. 1600, the desiccation of Lake Cahuilla resulted in an intensification of land use in the San Geronio Pass, the San Jacinto Plain, and Perris Valley regions that was reflected into the ethnohistoric period (Williams and Belcourt, 2014: 11, 12). (Bean et al. 1991; Wilke 1974, 1978; Schaefer 1994).

F3-218

Page D.7-5

DEIR/DEIS Text:

a time characterized by warm and arid conditions referred to as the Medieval Warm Period (approximately A.D 800 to 1350) (Williams and Belcourt, 2014: 12).

SCE Comment:

Please revise as follows:

a time characterized by warm and arid conditions referred to as the Medieval Warm Period (approximately A.D 800 to 1350) (Williams and Belcourt, 2014: 12). (Sutton et al. 2007).

F3-219

Page D.7-5

DEIR/DEIS Text:

According to some, the shoreline of Lake Cahuilla fluctuated, the habitats were unstable and unreliable, and lakeshore settlement patterns must have been seasonal. Others argue that Lake Cahuilla was stable and supported year-round, or nearly year-round, settlement bases (Williams and Belcourt, 2014: 12).

SCE Comment:

Please revise as follows:

According to some Weide (1974), the shoreline of Lake Cahuilla fluctuated, the habitats were unstable and unreliable, and lakeshore settlement patterns must have been seasonal. Others Wilke (1978) argue that Lake Cahuilla was stable and supported year-round, or nearly year-round, settlement bases (Williams and Belcourt, 2014: 12).

F3-220

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page D.7-5 & 6

#### DEIR/DEIS Text:

Based on the concept of Lake Cahuilla providing a stable habitat that supported year-round settlement, it was inferred that the sudden drying up of Lake Cahuilla resulted in the permanent shift of populations from the lakeshore to locations of low desert or upland resources, such as Coachella Valley or the Peninsular Range. However, it is unclear if the shift in lakeshore populations after the final recession of the lake reflects a more subtle, rather than a major, readjustment in settlement change. If the hypothesis of Lake Cahuilla being used more as a secondary, seasonal resource is taken into account, then the drying up of the lake would not have had such a dramatic effect on regional settlement patterns (Williams and Belcourt, 2014: 12).

#### SCE Comment:

Please revise as follows:

Based on the concept of Lake Cahuilla providing a stable habitat that supported year-round settlement, Wilke (1978) inferred that the sudden drying up of Lake Cahuilla resulted in the permanent shift of populations from the lakeshore to locations of low desert or upland resources, such as Coachella Valley or the Peninsular Range. However, it is unclear if the shift in lakeshore populations after the final recession of the lake reflects a more subtle, rather than a major, readjustment in settlement change. If the hypothesis of Lake Cahuilla being used more as a secondary, seasonal resource is taken into account, then the drying up of the lake would not have had such a dramatic effect on regional settlement patterns Wilke (1978; Schaefer 1994). ~~(Williams and Belcourt, 2014:12).~~

F3-221

### Page D.7-6

#### DEIR/DEIS Text:

The studies further hypothesized that settlements may have been clustered at more reliable water sources during this time, such as the coast, Lake Cahuilla, or Lake Elsinore (Williams and Belcourt, 2014: 13).

#### SCE Comment:

Please revise as follows:

The studies further hypothesized that settlements may have been clustered at more reliable water sources during this time, such as the coast, Lake Cahuilla, or Lake Elsinore ~~(Williams and Belcourt, 2014: 13)~~ (Goldberg 2001).

F3-222

### Page D.7-6

#### DEIR/DEIS Text:

On the other hand, the Eastside Reservoir Project's Late Prehistoric (A.D. 1200 to 1540) and Protohistoric (A.D. 1540 to 1770s) periods coincide with the Little Ice Age, generally dated from A.D. 1400 to 1875. During these periods, the climate was cooler and moister, and the sites identified within the Eastside Reservoir Project area reflect a substantial increase in diversity and number, longer occupation periods, and more sedentary land use. Intensification of land use also occurred in neighboring San Geronian Pass and Perris Valley. However, the role that the desiccation of Lake Cahuilla played in the population growth and in the intensification of land use in these areas is still not entirely clear (Williams and Belcourt, 2014: 13).

#### SCE Comment:

Please revise as follows:

On the other hand, the Eastside Reservoir Project's Late Prehistoric (A.D. 1200 to 1540) and Protohistoric (A.D. 1540 to 1770s) periods coincide with the Little Ice Age, generally dated from A.D. 1400 to 1875 (Goldberg 2001; Sutton et al. 2007). During these periods, the climate was cooler and moister, and the sites identified within the Eastside Reservoir Project area reflect a substantial increase in diversity and number, longer occupation periods, and more sedentary land use. Intensification of land use also occurred in neighboring San Geronian Pass and Perris Valley (Bean et al. 1991; Wilke 1974). However, the role that the desiccation of Lake Cahuilla played in the population growth and in the intensification of land use in these areas is still not entirely clear ~~(Williams and Belcourt, 2014:13)~~ (Schaefer 1994; Lavlander 2006).

F3-223



### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.7-6

##### DEIR/DEIS Text:

Due to the inland geographical location of the Cahuilla and Serrano territories, the Spanish institutions did not directly affect them as much (Williams and Belcourt, 2014:13).

##### SCE Comment:

Please revise as follows:

Due to the inland geographical location of the Cahuilla and Serrano territories, the Spanish institutions did not directly affect them as much (Williams and Belcourt, 2014:13). (Strong 1929; Bean 1978).

F3-224

#### Page D.7-7

##### DEIR/DEIS Text:

The Cahuilla relied on hunting rabbits and other small game, and gathering acorns, mesquite and screw beans, pinyon nuts, and cactus bulbs for subsistence. In addition, Cahuilla practiced proto-agriculture where corn, beans, squash, and melon were harvested. Cahuilla used stone mortars and pestles, manos and metates, wooden mortars, baskets, pottery, arrow shaft straighteners, willow and mesquite bows and arrows, and numerous ceremonial instruments (Williams and Belcourt, 2014:14).

##### SCE Comment:

Please revise as follows:

The Cahuilla relied on hunting rabbits and other small game, and gathering acorns, mesquite and screw beans, pinyon nuts, and cactus bulbs for subsistence. In addition, Cahuilla practiced proto-agriculture where corn, beans, squash, and melon were harvested. Cahuilla used stone mortars and pestles, manos and metates, wooden mortars, baskets, pottery, arrow shaft straighteners, willow and mesquite bows and arrows, and numerous ceremonial instruments (Williams and Belcourt, 2014:14). (Bean 1972, 1978; Caricco et al. 1982).

F3-225

#### Page D.7-7

##### DEIR/DEIS Text:

Sedentary villages were located in diverse ecological zones, and exploitation of resource areas was strictly controlled by owner-ship of resource territories along family, lineage, and village lines (Williams and Belcourt, 2014:14).

##### SCE Comment:

Please revise as follows:

Sedentary villages were located in diverse ecological zones, and exploitation of resource areas was strictly controlled by owner-ship of resource territories along family, lineage, and village lines (Williams and Belcourt, 2014:14). (Strong 1929).

F3-226

#### Page D.7-7

##### DEIR/DEIS Text:

These summer-fall camps were also subdivisions of the primary winter camp, being occupied by smaller clan subdivisions of the larger clan-group (Williams and Belcourt, 2014:14, 15).

##### SCE Comment:

Please revise as follows:

These summer-fall camps were also subdivisions of the primary winter camp, being occupied by smaller clan subdivisions of the larger clan-group (Williams and Belcourt, 2014:14, 15). (Bean and Shipek 1978; White 1963).

F3-227

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page D.7-7

#### DEIR/DEIS Text:

Researchers document the Serrano as highly mobile, utilitarian-based societies, residing in permanent villages with satellite camps spread throughout their territories. Plant and animal resources were widely dispersed across the landscape. Therefore, many collecting and food processing areas were used throughout the year as different resources became available in various life zones. The Serrano were loosely organized into exogamous clans that served as the largest autonomous political and landholding unit. There was no form of pan-tribal political union among the clans, all bonds being strictly ceremonial in nature with alignments arising along lines of economic, marital, or ceremonial reciprocity. In addition to forming bonds with other Serrano clans, they also formed alliances with Cahuilla, Chemehuevi, Gabrielino, and Cupeño groups (Williams and Belcourt, 2014:15)

#### SCE Comment:

Please revise as follows:

Researchers document the Serrano as highly mobile, utilitarian-based societies, residing in permanent villages with satellite camps spread throughout their territories (Bean et al. 1981; Kroeber 1925). Plant and animal resources were widely dispersed across the landscape. Therefore, many collecting and food processing areas were used throughout the year as different resources became available in various life zones (Davis 1974). The Serrano were loosely organized into exogamous clans that served as the largest autonomous political and landholding unit (Strong 1929). There was no form of pan-tribal political union among the clans, all bonds being strictly ceremonial in nature with alignments arising along lines of economic, marital, or ceremonial reciprocity. In addition to forming bonds with other Serrano clans, they also formed alliances with Cahuilla, Chemehuevi, Gabrielino, and Cupeño groups (Williams and Belcourt, 2014:15) (Bean and Smith 1978:572).

F3-228

### Page D.7-7

#### DEIR/DEIS Text:

Serrano subsistence included gathering, hunting, and (occasionally) fishing. Material culture included a wide variety of implements, including baskets; pottery; stone milling equipment; stone, wood, and bone implements; rabbit skin blankets; and woven nets and storage pouches.

#### SCE Comment:

Please revise as follows:

Serrano subsistence included gathering, hunting, and (occasionally) fishing. Material culture included a wide variety of implements, including baskets; pottery; stone milling equipment; stone, wood, and bone implements; rabbit skin blankets; and woven nets and storage pouches (Drucker 1937).

F3-229

### Page D.7-7

#### DEIR/DEIS Text:

The primary factor for village choice was proximity to a year-round water source (Williams and Belcourt, 2014:15).

#### SCE Comment:

Please revise as follows:

The primary factor for village choice was proximity to a year-round water source (Williams and Belcourt, 2014:15). (Strong 1929; Bean and Smith 1978).

F3-230

### Page D.7-8

#### DEIR/DEIS Text:

In the pursuit of deserted soldiers, Fages traveled from San Diego east to the desert in Imperial County and then northwest through the San Jacinto Mountains and San Jacinto Valley towards Riverside.

#### SCE Comment:

Please revise as follows:

In the pursuit of deserted soldiers, Fages traveled from San Diego east to the desert in Imperial County and then northwest through the San Jacinto Mountains and San Jacinto Valley towards Riverside (Leech 2004).

F3-231

### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.7-8

##### DEIR/DEIS Text:

Once reaching the Peninsular Range, the expeditions headed north-northwest, with Anza's route following a similar one as Fages' from the San Jacinto Mountains and northwest through Bautista Canyon into the San Jacinto Valley (Williams and Belcourt, 2014: 16).

##### SCE Comment:

Please revise as follows:

Once reaching the Peninsular Range, the expeditions headed north-northwest, with Anza's route following a similar one as Fages' from the San Jacinto Mountains and northwest through Bautista Canyon into the San Jacinto Valley (~~Williams and Belcourt, 2014: 16~~) (Bulton 1930; Rolle 1963).

F3-232

#### Page D.7-9

##### DEIR/DEIS Text:

after a decline in mission activity occurred followed by the secularization of the missions in the 1830s (Williams and Belcourt, 2014: 16, 17).

##### SCE Comment:

Please revise as follows:

after a decline in mission activity occurred followed by the secularization of the missions in the 1830s (~~Williams and Belcourt, 2014: 16, 17~~) (Leech 2004).

F3-233

#### Page D.7-9

##### DEIR/DEIS Text:

This portion, the northern half of the San Jacinto Viejo Rancho, became known as the *Rancho San Jacinto Nuevo y Potrero* (Williams and Belcourt, 2014:17).

##### SCE Comment:

Please revise as follows:

This portion, the northern half of the San Jacinto Viejo Rancho, became known as the *Rancho San Jacinto Nuevo y Potrero* (~~Williams and Belcourt, 2014:17~~) (Leach 2004).

F3-234

#### Page D.7-9

##### DEIR/DEIS Text:

As was the case with many early Spanish, Mexican, and American overland routes, the famed Coco-Maricopa Trail that began as an Indian trail served as a mail route between Sonora Mexico and Alta California and then later as the Bradshaw Trail (Williams and Belcourt, 2014:17)

##### SCE Comment:

Please revise as follows:

As was the case with many early Spanish, Mexican, and American overland routes, the famed Coco-Maricopa Trail that began as an Indian trail served as a mail route between Sonora Mexico and Alta California and then later as the Bradshaw Trail (~~Williams and Belcourt, 2014:17~~) (Bean and Mason 1962).

F3-235

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page D.7-9

##### DEIR/DEIS Text:

Southern California was increasingly developed and occupied as more Americans migrated to the region in pursuit of land, gold and other minerals, agriculture, and speculation interests (Williams and Belcourt, 2014:17).

##### SCE Comment:

Please revise as follows:

Southern California was increasingly developed and occupied as more Americans migrated to the region in pursuit of land, gold and other minerals, agriculture, and speculation interests (Williams and Belcourt, 2014:17), (Leach 2004).

F3-236

#### Page D.7-10

##### DEIR/DEIS Text:

Known as the Bradshaw Trail, the route followed ancient Cahuilla and Maricopa trails that linked wells and springs located throughout the desert (Williams and Belcourt, 2014:18).

##### SCE Comment:

Please revise as follows:

Known as the Bradshaw Trail, the route followed ancient Cahuilla and Maricopa trails that linked wells and springs located throughout the desert (Williams and Belcourt, 2014:18), (Vredenburg et al. 1981).

F3-237

#### Page D.7-10

##### DEIR/DEIS Text:

Until the coming of paved roads and automobiles in the 1930s, the railroad served as the major transportation artery across the deserts (Williams and Belcourt, 2014:18).

##### SCE Comment:

Please revise as follows:

Until the coming of paved roads and automobiles in the 1930s, the railroad served as the major transportation artery across the deserts (Williams and Belcourt, 2014:18), (Fickwirth 1992; Myrick 1962).

F3-238

#### Page D.7-10

##### DEIR/DEIS Text:

Much of the old U.S. 60 is still preserved, with some sections in the desert remaining virtually untouched since it ceased to be a legislative route. Additional evidence of U.S. 60 can still be seen in stacks of highway survey monuments used by construction workers while upgrading the road to federal conditions as dictated by the 1926 mandate (Williams and Belcourt, 2014:18).

##### SCE Comment:

Please revise as follows:

Much of the old U.S. 60 is still preserved, with some sections in the desert remaining virtually untouched because it ceased to be a legislative route. Additional evidence of U.S. 60 can still be seen in stacks of highway survey monuments used by construction workers while upgrading the road to federal conditions as dictated by the 1926 mandate (Williams and Belcourt, 2014:18), (Cooper 2004).

F3-239

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-10

DEIR/DEIS Text:

The MWD also established better infrastructure in the desert with the grading of new roads, a water supply system, power lines, and telephone lines, leading to new towns associated with the construction of the CRA (Williams and Belcourt, 2014:18, 19).

SCE Comment:

Please revise as follows:

The MWD also established better infrastructure in the desert with the grading of new roads, a water supply system, power lines, and telephone lines, leading to new towns associated with the construction of the CRA (Williams and Belcourt, 2014:18, 19) (Gruen 1988).

F3-240

Page D.7-30

DEIR/DEIS Text:

The following significance criteria apply to cultural resources:

- The Proposed Project would cause an adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines.
- The Proposed Project would cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines.
- The Proposed Project would cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.

SCE Comment:

Because impacts are likely but not inevitable, SCE recommends the following revisions: The following significance criteria apply to cultural resources:

- The Proposed Project ~~would~~ could cause an adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines.
- The Proposed Project ~~would~~ could cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines.
- The Proposed Project ~~would~~ could cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.

F3-241

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages D.7-30 through 31

F3-242

### DEIR/DEIS Text:

The following significance criteria apply to cultural resources:

- The Proposed Project would cause a substantial adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines.
- The Proposed Project would cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines.
- The Proposed Project would cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.
- The Proposed Project could uncover, expose, and/or damage Native American human remains.

Under all of these criteria, adverse changes and impacts include the following:

- Physical, visual, or audible disturbance resulting from construction, operation, and development would affect the integrity of a resource or the qualities that make it eligible for the NRHP or CRHR;
- Exposure of cultural resources to vandalism or unauthorized collecting;
- A substantial increase in the potential for erosion or other natural processes that could affect cultural resources; or
- Neglect of a cultural resource that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe.

### SCE Comment:

For accuracy, please revise as follows:

The following significance criteria apply to cultural resources: According to the CEQA Checklist and Section 106, a project causes a potentially significant impact when the project will:

- ~~The Proposed Project would~~ cause an adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines.
- ~~The Proposed Project would~~ cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines.
- ~~The Proposed Project would~~ cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.
- ~~The Proposed Project could~~ uncover, expose, and/or damage Native American human remains. Under all of these criteria, adverse changes and impacts include the following:
- ~~Cause~~ a physical, visual, or audible disturbance resulting from construction, operation, and development that would affect the integrity of a resource or the qualities that make it eligible for the NRHP or CRHR;
- ~~Exposure of~~ expose cultural resources to vandalism or unauthorized collecting;
- ~~Cause~~ a substantial increase in the potential for erosion or other natural processes that could affect cultural resources; or
- ~~Cause~~ neglect of a cultural resource that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe

Page D.7-33

F3-243

### DEIR/DEIS Text:

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

### SCE Comment:

No direct impacts to known historic properties were identified in the DEIR/DEIS. Please revise as follows:

Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.7-33**

**DEIR/DEIS Text:**

Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

**SCE Comment:**

No direct impacts to known historic properties were identified in the DEIR/DEIS. Please revise as follows:

Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

F3-244

**Page D.7-33**

**DEIR/DEIS Text:**

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

**SCE Comment:**

Impacts are possible, but not inevitable. Please revise as follows:

Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

F3-245

**Page D.7-33**

**DEIR/DEIS Text:**

Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

**SCE Comment:**

Impacts are possible, but not inevitable. Please revise as follows:

Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

F3-246

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-33

DEIR/DEIS Text:

~~Avoid environmentally sensitive areas. SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Measures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct construction monitoring). Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/historic resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environmentally Sensitive Areas (ESAs) for the duration of the Proposed Project~~

SCE Comment:

This measure addresses two different but separate activities - conducting surveys and protecting resources. Consistent with the heading, and because surveys are a standard regulatory requirement, please revise as follows:

~~Avoid environmentally sensitive areas. SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Measures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct construction monitoring). Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/historic resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environmentally Sensitive Areas (ESAs) for the duration of the Proposed Project or as outlined in the Cultural Resource Management Plan.~~

F3-247

Page D.7-34

DEIR/DEIS Text:

CL-1c

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.

SCE Comment:

Please revise as follows:

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Worker's Environmental Training Program training so they are aware of the potential for inadvertently exposing buried archaeological deposits.

CL-1e

~~Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.~~

F3-248



### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.7-35

##### DEIR/DEIS Text:

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

##### SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

F3-249

#### Page D.7-35

##### DEIR/DEIS Text:

Mitigation Measures for Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

##### SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Mitigation Measures for Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

F3-250

#### Page D.7-36

##### DEIR/DEIS Text:

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

##### SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

F3-251

#### Page D.7-36

##### DEIR/DEIS Text:

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

##### SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

F3-252

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.7-36**

**DEIR/DEIS Text:**

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties (Class II)

**SCE Comment:**

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-1: Construction, operation and maintenance, and restoration would could cause an adverse change to known historic properties (Class II)

F3-253

**Page D.7-36**

**DEIR/DEIS Text:**

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

**SCE Comment:**

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-254

**Page D.7-37**

**DEIR/DEIS Text:**

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)

**SCE Comment:**

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-2: Construction, operation and maintenance, and restoration would could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)

F3-255

**Page D.7-37**

**DEIR/DEIS Text:**

*Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)*

For the connected actions in the Desert Center and Blythe areas, unknown buried resources could be inadvertently unearthed during ground-disturbing activities. Destruction of potentially significant cultural resources would be a significant impact. In the event that a previously unknown archaeological resource is discovered, the implementation of mitigation measures similar Mitigation Measure CL-2a (Treatment of previously unidentified cultural resources) would ensure that impacts are reduced to a less than significant level (Class II). As well, unmarked burials could be inadvertently unearthed and would have to be properly treated in accordance with federal and state regulations. Nonetheless, the effect would be considered adverse under the regulations in the NHPA, and therefore, treatment of the remains other than protection in place, would not reduce the impacts to a less than significant level. Impacts would remain significant (Class I).

**SCE Comment:**

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-256

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.7-38**

**DEIR/DEIS Text:**

Two impacts related to cultural resources were identified for the Proposed Project.

**SCE Comment:**

Please revise as follows:

Two Impact CL-1 and CL-2 impacts related to cultural resources were identified for the Proposed Project.

F3-257

**Page D.7-39**

**DEIR/DEIS Text:**

Two impacts related to cultural resources were identified for the Proposed Project.

**SCE Comment:**

Please revise as follows:

Two Impact CL-1 and CL-2 impacts related to cultural resources were identified for the Proposed Project.

F3-258

**Page D.7-40**

**DEIR/DEIS Text:**

Two impacts related to cultural resources were identified for the Proposed Project.

**SCE Comment:**

Please revise as follows:

Two Impact CL-1 and CL-2 impacts related to cultural resources were identified for the Proposed Project.

F3-259

**Page D.7-41**

**DEIR/DEIS Text:**

**D.7.4.3 Phased Build Alternative**

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

**SCE Comment:**

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional survey and associated additional impact analysis. The additional disturbance areas for construction activities could result in additional cultural impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

F3-260

**Page D.7-43**

**DEIR/DEIS Text:**

Table D.7-14. Mitigation Monitoring Program – Cultural Resources

**SCE Comment:**

Please update these measures with the recommended changes listed above.

F3-261

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-44

DEIR/DEIS Text:

CL-1a: Avoid environmentally sensitive areas. SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Measures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct construction monitoring). Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/historic resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environmentally Sensitive Areas (ESAs) for the duration of the Proposed Project

SCE Comment:

This measure addresses two different but separate activities - conducting surveys and protecting resources. Consistent with the heading, and because surveys are a standard regulatory requirement, please revise as follows:

CL-1a: Avoid environmentally sensitive areas. SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Measures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct construction monitoring). Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/historic these resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environmentally Sensitive Areas (ESAs) for the duration of the Proposed Project or as outlined in the Cultural Resource Management Plan.

Page D.7-44

DEIR/DEIS Text:

CL-1c

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.

SCE Comment:

Please revise as follows:

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Worker's Environmental Training Program training so they are aware of the potential for inadvertently exposing buried archaeological deposits.

Pages D.7-45 through 47

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J. 1972. *Mukat's People: The Cahuilla Indians of Southern California*. University of California Press, Berkeley and Los Angeles.

1978. *Cahuilla*. In *California*, edited by R.F. Heizer, pp. S75-S87. *Handbook of North American Indians*, Vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington D.C.

F3-262

F3-263

F3-264

Comment Set F3: Southern California Edison Company (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J., and William Marvin Mason. 1962. Diaries and Accounts of the Romero Expeditions in Arizona and California, 1823-26. W. Ritchie Press, Los Angeles.

F3-265

Pages D.7-45 through 47

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J., and Florence C. Shipek. 1978. Luiseno. In California, edited by R.F. Heizer, pp. 550-563. Handbook of North American Indians, vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

F3-266

Pages D.7-45 through 47

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell John, and Charles R. Smith. 1978. Gabrielino. In California, edited by R.F. Heizer, pp. 538-549. Handbook of North American Indians, vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

F3-267

Pages D.7-45 through 47

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J. and Sylvia B. Vane, eds. 1978. Persistence and Power: A Study of Native American Peoples in the Sonoran Desert and the Devers-Palo Verde High Voltage Transmission Line. With contributions by Lowell John Bean, Henry F. Dobyns, M. Kay Martin, Richard W. Stoffle, Sylvia Brakke Vane, and David R. M. White. Prepared by Cultural Systems Research, Inc. for Southern California Edison, Rosemead, California. California Historical Resources Information System, Eastern Information Center, University of California, Riverside.  
. 1979. Native Americans of Western Riverside County California and the Devers-Mira Loma 500kV Transmission Line Route (Lamb-Canyon-Mira Loma Section). Prepared by Cultural Systems Research, Inc., Menlo Park, California, for Southern California Edison Company, Rosemead, California.

F3-268

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Pages D.7-4S through 47**

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J., Sylvia B. Vane, Michael Lerch, and Jackson Young. 1981. Native American Places in the San Bernardino National Forest, San Bernardino and Riverside Counties, California. Report prepared by Cultural Systems Research, Inc., Menlo Park, for the US Forest Service, South Zone Contracting Office, Arcadia, California.

F3-269

**Pages D.7-4S through 47**

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J., Sylvia B. Vane, and Jackson Young. 1991. The Cahuilla Landscape: The Santa Rosa and San Jacinto Mountains. Menlo Park, CA: Ballena Press.

F3-270

**Pages D.7-4S through 47**

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Bolton, Herbert E. 1930. Anza's California Expeditions, Vols. I-IV. University of California Press, Berkeley.

F3-271

**Pages D.7-4S through 47**

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Cooper, Casey. 2004. U.S. Highway 60. In, Historic California U.S. Highways. Electronic document, <http://gbcnet.com/ushighways/US60/US60.html>, accessed April 2005.

F3-272

**Pages D.7-4S through 47**

DEIR/DEIS Text:

None-Missing Reference

SCE Comment:

Please add the following:

Crabtree, Robert H. 1981. Archaeology. In A Cultural Resources Overview of the Colorado Desert Planning Units. Eric W. Ritter, Series editor. Report on file, PSSCFO, BLM, Palm Springs, CA.

F3-273

**Comment Set F3: Southern California Edison Company (cont.)**

**Pages D.7-4S through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Davis, James T. 1974. Trade Routes and Economic Exchange Among the Indians of California. Publications in Archaeology, Ethnology, and History 3. Ballena Press, Ramona, California.

F3-274

**Pages D.7-4S through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

DeCarlo, Matthew M., and Diane L. Winslow. 2015a. With contributions by Audry Williams and Andrew Belcourt. Engineering Refinements Survey and Recommendation of Eligibility for Cultural Resources with Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.  
2015b. With contributions by Audry Williams and Andrew Belcourt. Results of Archaeological Testing at Guachama Rancheria, P-36-002311; CA-SBR-2311H, for the Southern California Edison Company's West of Devers Upgrade Project, San Bernardino County, California.

2015c. With contributions by Audry Williams and Andrew Belcourt. Cultural Resources Impact Assessment and Evaluation Status for the Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.

F3-275

**Pages D.7-4S through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Drucker, Philip. 1937. Culture Element Distributions: V, Southern California. University of California Anthropological Records 1(1).

F3-276

**Pages D.7-4S through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Fickewirth, A.A. 1992. California Railroads. Golden West Books, San Marino, California.

F3-277

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Goldberg, Susan. 2001. Land Use, Mobility, and Intensification Evaluation and Refinement of the Model. In Metropolitan Water District of Southern California, Eastside Reservoir Project, Final Report of Archaeological Investigations, Volume IV: Prehistoric Archaeology Synthesis of Findings, edited by S. K. Goldberg, **Chapt. 14**. Report prepared by Applied Earthworks, Hemet, California for Metropolitan Water District of Southern California, Los Angeles.

**F3-278**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Gruen, J. Philip. 1998. Historic American Engineering Record, Colorado River Aqueduct from Colorado River to Lake Mathews, Parker Dam Vicinity, San Bernardino County, California. HAER CA-226. National Park Service, Washington, D.C.

**F3-279**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Hall, Matt E. 1993. Archaeology of Seven Prehistoric Sites in Tiefert Basin, Fort Irwin, San Bernardino County, California.

**F3-280**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Horne, Melinda C., and Dennis P. McDougall. 1997. Cultural Resource Survey in the Southern Portion of the National Training Center, Fort Irwin, San Bernardino County, California.

**F3-281**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Kroeber, Alfred L. 1907. Shoshonean Dialects of California. University of California Publications in American Archaeology and Ethnology 4(3):66-165.  
.1925. Handbook of the Indians of California. American Bureau of Ethnology Bulletin 78. Washington, D.C.

**F3-282**



**Comment Set F3: Southern California Edison Company (cont.)**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

F3-283

**SCE Comment:**

Please add the following:

Laylander, Don. 2006. The Regional Consequences of Lake Cahuilla. San Diego State University Occasional Archaeology Papers 1:59-77. [http://soap.edu/Volume1/Lake Cahuilla/cahuilla.htm](http://soap.edu/Volume1/Lake_Cahuilla/cahuilla.htm)

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

F3-284

**SCE Comment:**

Please add the following:

Love, Bruce, and Marian Dahdul. 2002. Desert Chronologies and the Archaic Period in the Coachella Valley. Pacific Coast Archaeology Society Quarterly 38(1-2).

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

F3-285

**SCE Comment:**

Please add the following:

Lech, Steve. 2004. Along the Old Roads: A History of the Portion of Southern California That Became Riverside County, 1772-1893. Steve Lech, Riverside, California

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

F3-286

**SCE Comment:**

Please add the following:

McDonald, A. Meg. 1992. Indian Hill Rockshelter and Aboriginal Cultural Adaptation in Anza-Borrego Desert State Park, southeastern California. Unpublished Ph.D. dissertation, Department of Anthropology, University of California, Riverside.

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

F3-287

**SCE Comment:**

Please add the following:

Miller, Wick R. 1984. The Classification of the Uto-Aztecan Languages Based on Lexical Evidence. International Journal of American Linguistics 50(1):1-24.

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**F3-288**

**SCE Comment:**

Please add the following:

Moratto, Michael J. 1984. *California Archaeology*. Academic Press.

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**F3-289**

**SCE Comment:**

Please add the following:

Myrick, David F. 1962. *Railroads of Nevada and Eastern California*. Howell-North Books, Berkeley.

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**F3-290**

**SCE Comment:**

Please add the following:

Rolle, A. F. 1963. *California: A History*. Thomas Y. Crowell Company, New York, New York.

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**F3-291**

**SCE Comment:**

Please add the following:

Schaefer, Jerry. 1994. *The Challenge of Archaeological Research in the Colorado Desert: Recent Approaches and Discoveries*. *Journal of California and Great Basin Anthropology* 16(1):60-80.

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**F3-292**

**SCE Comment:**

Please add the following:

Schaefer, Jerry and Don Laylander. 2007. *The Colorado Desert: Ancient Adaptations to Wetlands and Wastelands*. In, *California Prehistory: Colonization, Culture, and Complexity*, edited by T. L. Jones and K. A. Klar, pp. 247-257. Alta Mira Press.

**Comment Set F3: Southern California Edison Company (cont.)**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Strong, William D. 1929. *Aboriginal Society in Southern California*. University of California Publications in American Archaeology and Ethnology 26(1):1–358. Berkeley.

F3-293

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Sutton, Mark Q., Mark E. Basgall, Jill K. Gardner, and Mark W. Allen. 2007. *Advances in Understanding Mojave Desert Prehistory*. In *California Prehistory: Colonization, Culture, and Complexity*. Edited by Terry L. Jones and Kathryn A. Klar, pp. 229–245. Alta Mira Press.

F3-294

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Vredenburgh, Larry M., Gary L. Shumway, and Russell D. Hartill. 1981. *Desert Fever: An Overview of Mining in the California Desert*. Living West Press, Canoga Park, California.

F3-295

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Warren, Claude N. 1984. *The Desert Region*. In *California Archaeology*, edited by M. J. Moratto, pp. 339–430. Academic Press, Orlando, Florida.

F3-296

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**SCE Comment:**

Please add the following:

Warren, Claude N., and Robert H. Crabtree. 1986. *Prehistory of the Southwestern Area*. In *Great Basin*, edited by W. L. D'Azevedo, pp. 183–193. *Handbook of the North American Indians*, Vol. 11. W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

F3-297

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**F3-298**

**SCE Comment:**

Please add the following:

Weide, David L. 1974. Regional Environmental History of the Yuha Desert. In Background to Prehistory of the Yuha Desert Region, edited by P.J. Wilke, pp. 9-20. Ballen Press Anthropological Papers 5. Ramona.

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**F3-299**

**SCE Comment:**

Please add the following:

White, Raymond C. 1963. Luiseño Social Organization. University of California Publications in American Archaeology and Ethnology 48(2):91-194.

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

None-Missing Reference

**F3-300**

**SCE Comment:**

Please add the following:

Wilke, Philip. 1974. Settlement and Subsistence at Perris Reservoir: A Summary of Archaeological Investigations. In Perris Reservoir Archaeology, edited by J. F. O'Connell, P. J. Wilke, T. F. King, and C. L. Mix, pp. 20-30. California Department of Parks and Recreation Reports No. 14. Sacramento.  
.1978. Late Prehistoric Human Ecology at Lake Cahuilla, Coachella Valley, California. Contributions of the University of California Archaeological Research Facility 38. University of California, Berkeley.

**Pages D.7-45 through 47**

**DEIR/DEIS Text:**

SCE (Southern California Edison). 2014. Archival Research and Evaluation Results of 33 Cultural Resources for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. Assembled by Williams, Audry, and Andrew Belcourt, with contributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall. August.

**F3-301**

**SCE Comment:**

Please add the following:

SCE (Southern California Edison) Williams, Audry, and Andrew Belcourt. 2014. With contributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall. 2014. Archival Research and Evaluation Results of 33 Cultural Resources for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. Prepared by SCE. Assembled by Williams, Audry, and Andrew Belcourt, with contributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall. August.

## Responses to Comment Set F3 – Section D.7 Cultural Resources

- F3-197 The commenter suggests including an additional citation in the text for accuracy. We agree with the commenter's suggestion and we have modified Section D.7 (Cultural Resources) to include citation to ASM Affiliates (ASM).
- F3-198 The commenter suggests correcting the citation for accuracy. We agree with the commenter's suggestion and we have modified Section D.7.1.1 (Cultural Resources, Regional Setting and Approach to Data Collection) to include citation to DeCarlo and Winslow, 2015a.
- F3-199 The commenter suggests revising the text and including additional citations for accuracy. We agree with the commenter's suggestion and we have modified Section D.7.1.1 to include citation to DeCarlo and Winslow, LSA and Williams, and Williams and Belcourt.
- F3-200 The commenter suggests including an additional citation for accuracy. We agree with the commenter's suggestion and we have modified Section D.7.1.1 to include the citations, which are the same as Comment F3-199.
- F3-201 The commenter suggests using the primary citation, instead of Williams and Belcourt (2014) throughout the Environmental Setting section (D.7.1.2). We agree with the commenter's suggestion and have modified Section D.7.1.2 to include the primary references. Other suggestions for citations identified in Comments F3-202 through F3-240 have also been included in the EIR. These are not individually enumerated here. The changes are in Section D.7.1.2 (Cultural Resources, Environmental Setting).
- F3-202 See Response to Comment F3-201.
- F3-203 See Response to Comment F3-201.
- F3-204 See Response to Comment F3-201.
- F3-205 See Response to Comment F3-201.
- F3-206 See Response to Comment F3-201.
- F3-207 See Response to Comment F3-201.
- F3-208 See Response to Comment F3-201.
- F3-209 See Response to Comment F3-201.
- F3-210 See Response to Comment F3-201.
- F3-211 See Response to Comment F3-201.
- F3-212 See Response to Comment F3-201.
- F3-213 See Response to Comment F3-201.
- F3-214 See Response to Comment F3-201.
- F3-215 See Response to Comment F3-201.
- F3-216 See Response to Comment F3-201.
- F3-217 See Response to Comment F3-201.
- F3-218 See Response to Comment F3-201.
- F3-219 See Response to Comment F3-201.
- F3-220 See Response to Comment F3-201.

F3-221	See Response to Comment F3-201.
F3-222	See Response to Comment F3-201.
F3-223	See Response to Comment F3-201.
F3-224	See Response to Comment F3-201.
F3-225	See Response to Comment F3-201.
F3-226	See Response to Comment F3-201.
F3-227	See Response to Comment F3-201.
F3-228	See Response to Comment F3-201.
F3-229	See Response to Comment F3-201.
F3-230	See Response to Comment F3-201.
F3-231	See Response to Comment F3-201.
F3-232	See Response to Comment F3-201.
F3-233	See Response to Comment F3-201.
F3-234	See Response to Comment F3-201.
F3-235	See Response to Comment F3-201.
F3-236	See Response to Comment F3-201.
F3-237	See Response to Comment F3-201.
F3-238	See Response to Comment F3-201.
F3-239	See Response to Comment F3-201.
F3-240	See Response to Comment F3-201.
F3-241	The commenter recommends revising the significance criteria in Section D.7.3.2.1 to reflect that impacts to cultural resources are likely, but not inevitable. Significance criteria relate to impact determinations under CEQA, not NEPA. However, we agree that Project-related impacts to cultural resources are likely, not inevitable. In the CPUC's Final EIR, the wording of the significance criteria was slightly revised to reflect potential impacts by explaining when the project would cause a potentially significant impact rather than stating that the Proposed Project would cause one. See also Final EIS Section D.7.3.2 (Cultural Resources, Impact Criteria).
F3-242	The commenter suggests revising the significance criteria in Section D.7.3.2.1 for accuracy. The commenter's suggestion helps to clarify significance criteria; therefore, the text in Section D.7.3.2.1 has been modified to include the suggested revisions. See also Response to Comment F3-241.
F3-243	The commenter suggests revising Impact CL-1 in Section D.7.3.3 to reflect that no direct impacts to known historic properties were identified. The commenter's suggestion helps to clarify Impact CL-1; therefore, the impact statement has been modified to include the suggested revision, changing "would" to "could." See Section D.7.3.3 (Cultural Resources, Impacts and Mitigation Measures). Comments F3-244 through F3-246 repeat this comment.
F3-244	See Response to Comment F3-243.
F3-245	See Response to Comment F3-243.

- F3-246 See Response to Comment F3-243.
- F3-247 The commenter suggests revising Mitigation Measure CL-1a in Section D.7.3.3 to remove the pre-construction surveys, noting that the surveys are a standard regulatory requirement. The commenter also suggests revising Mitigation Measure CL-1a to reference the Cultural Resource Management Plan (CRMP) for details. The commenter's suggestions are noted; however, we disagree with the removal of pre-construction surveys from Mitigation Measure CL-1a (Avoid environmentally sensitive areas). The language will remain in Mitigation Measure CL-1a to ensure the surveys are completed and become part of the CRMP. However, the commenter's suggestion to reference the CRMP helps to clarify Mitigation Measure CL-1a; therefore, the Mitigation Measure has been modified to include the suggested reference to the CRMP.
- F3-248 The commenter suggests revising Mitigation Measure CL-1c in Section D.7.3.3 to include specifically the Worker's Environmental Training Program. The commenter's suggestion helps to clarify Mitigation Measure CL-1c; therefore, the Mitigation Measure has been modified to include the suggested revision, specifying the WETP.
- F3-249 The commenter notes that Impact CL-2 incorrectly assumes that the proposed Project will have unanticipated discoveries and that resources could not be avoided and recommends revising Impact CL-2 for clarification. The commenter's suggestion helps to clarify Impact CL-2; therefore, the impact statement has been modified to include the suggested revision, changing "would" to "could." Comments F3-250 through F3-253 and F3-255 repeat this revision request for Impacts CL-1 or CL-2, and the revisions have been made in the EIR/EIS.
- F3-250 See Response to Comment F3-249.
- F3-251 See Response to Comment F3-243.
- F3-252 See Response to Comment F3-249.
- F3-253 See Response to Comment F3-243.
- F3-254 See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-255 See Response to Comment F3-249.
- F3-256 See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-257 The commenter suggests revising the text in Section D.7.4 to include Impact numbers. The commenter's suggestion helps to clarify the alternatives section; therefore, the text in Section D.7.4 (Cultural Resources, Environmental Impacts of Project Alternatives) has been modified to include the suggested revision, adding Impact numbers. Comments F3-258 and F3-259 are similar in nature, and the revision has been made.
- F3-258 See Response to Comment F3-257.
- F3-259 See Response to Comment F3-257.
- F3-260 The commenter suggests construction requirements for the Phased Build Alternative were not addressed or were understated in the DEIR/DEIS and that additional cultural impacts could occur. See Responses to Comments F1-1, F1-10, and F1-14.
- F3-261 The commenter suggests revising Mitigation Measure CL-1a and Mitigation Measure CL-1c in Table D.7-14 consistent with the revisions in the text. The Mitigation Measures in the table have been revised to be consistent with the text revisions (see Responses to Comment F3-262 and F3-263 below).

- F3-262 Regarding Table D.7-14, the commenter suggests revising Mitigation Measure CL-1a in Section D.7.6 to remove the pre-construction surveys noting that the surveys are a standard regulatory requirement. The commenter also suggests revising Mitigation Measure CL-1a to reference the Cultural Resource Management Plan (CRMP) for details. The commenter's suggestion is noted; however, we disagree with the removal of pre-construction surveys from Mitigation Measure CL-1a. The language will remain in Mitigation Measure CL-1a to ensure the surveys are completed and become part of the CRMP. However, the commenter's suggestion to reference the CRMP helps to clarify Mitigation Measure CL-1a; therefore, the Mitigation Measure has been modified to include the suggested revision.
- F3-263 Regarding Table D.7-14, the commenter suggests revising Mitigation Measure CL-1c in Section D.7.6 to include Worker's Environmental Training. The commenter's suggestion helps to clarify Mitigation Measure CL-1c; therefore, the Mitigation Measure has been modified to include the suggested revision.
- F3-264 The commenter requests that the missing primary references be included in the References cited section. We agree with the commenter's suggestion and have modified Section D.7.7 (Cultural Resources, References) to include the primary references. Comments F3-265 through F3-301 provide additional references, which have been included in Section D.7.7.
- F3-265 See Response to Comment F3-264.
- F3-266 See Response to Comment F3-264.
- F3-267 See Response to Comment F3-264.
- F3-268 See Response to Comment F3-264.
- F3-269 See Response to Comment F3-264.
- F3-270 See Response to Comment F3-264.
- F3-271 See Response to Comment F3-264.
- F3-272 See Response to Comment F3-264.
- F3-273 See Response to Comment F3-264.
- F3-274 See Response to Comment F3-264.
- F3-275 See Response to Comment F3-264.
- F3-276 See Response to Comment F3-264.
- F3-277 See Response to Comment F3-264.
- F3-278 See Response to Comment F3-264.
- F3-279 See Response to Comment F3-264.
- F3-280 See Response to Comment F3-264.
- F3-281 See Response to Comment F3-264.
- F3-282 See Response to Comment F3-264.
- F3-283 See Response to Comment F3-264.
- F3-284 See Response to Comment F3-264.
- F3-285 See Response to Comment F3-264.
- F3-286 See Response to Comment F3-264.



F3-287	See Response to Comment F3-264.
F3-288	See Response to Comment F3-264.
F3-289	See Response to Comment F3-264.
F3-290	See Response to Comment F3-264.
F3-291	See Response to Comment F3-264.
F3-292	See Response to Comment F3-264.
F3-293	See Response to Comment F3-264.
F3-294	See Response to Comment F3-264.
F3-295	See Response to Comment F3-264.
F3-296	See Response to Comment F3-264.
F3-297	See Response to Comment F3-264.
F3-298	See Response to Comment F3-264.
F3-299	See Response to Comment F3-264.
F3-300	See Response to Comment F3-264.
F3-301	See Response to Comment F3-264.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.8 Socioeconomics and Environmental Justice

#### Page D.8-1

##### DEIR/DEIS Text:

In addition to the 220 kV upgrades, the Proposed Project includes:

- Upgrading substation equipment for 220 kV lines (Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations) and 66 kV lines (Timoteo and Tennessee Substations)

##### SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

In addition to the 220 kV upgrades, the Proposed Project includes:

- Upgrading substation equipment for 220 kV lines (Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations) and 66 kV lines (Timoteo and Tennessee Substations)

F3-302

#### Page D.8-2

##### DEIR/DEIS Text:

Substation Upgrades. The work required inside Etiwanda, Timoteo, and Tennessee Substations would consist of upgrades to and/or replacement of existing equipment.

##### SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations:

Substation Upgrades. The work required inside Etiwanda, Timoteo, and Tennessee Substations would consist of upgrades to and/or replacement of existing equipment.

F3-303

**Responses to Comment Set F3 – Section D.8 Socioeconomics and Environmental Justice**

- F3-302 The commenter states that additional engineering analysis shows Timoteo and Tennessee Substations are no longer needed to support the Project (see Response to Comment F3-65). Similar to throughout the Final EIS, in Section D.8 (Socioeconomics and Environmental Justice) the first bullet in Section D.8.1.1.2 has been revised, deleting these two substations.
- F3-303 This comment is similar to Comment F3-302 regarding substation upgrades. The text in Section D.8.1.1.2 on Substation Upgrades has been revised to delete these two substations.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.9 Geology and Soils

#### Pages D.9-27 through 28

##### DEIR/DEIS Text:

**Impact G-1: Project structures could be damaged by surface fault rupture at crossings of active and potentially active faults (Class II)**

For solar projects in the Desert Center and Blythe areas, regional seismic events could expose facilities to damage. Implementation of designs that comply with state and local building codes and other regulations would reduce seismic effects by ensuring that occupied buildings are constructed to withstand seismic shaking. Consistent with regulations and facility design standards (e.g., California Building Code, Title 24, Part 2), solar projects would implement measures that would reduce the likelihood of structural failure in the event of an earthquake. This impact is less than significant with mitigation (Class II).

##### SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-304

#### Page D.9-28

##### DEIR/DEIS Text:

**Impact G-3: Erosion could be triggered or accelerated due to construction activities (Class II)**

For the identified connected action projects, disturbance of existing soil and/or desert pavement could result in a substantial increase in on-site wind- and waterborne soil erosion. However, project design features, compliance with regulatory requirement related to fugitive dust control, and standard SWPPP BMPs would ensure that erosion due to project construction activities is minimized. For example, the Desert Harvest Project would implement Mitigation Measures MM AIR-1 (Fugitive Dust Control Plan), MM AIR-2 (Fugitive Dust Control of Unpaved Roads), and MM WAT-4 (Surface Water Protection Plan and Drainage Design Specifications) and the Palen Project has similar requirements regarding compliance with air quality and water regulations. Comparable measures would apply to other solar projects. Compliance with applicable regulations and mitigation measures of known projects would ensure that impacts are at a less than significant level with mitigation (Class II).

##### SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-305

#### Page D.9-29

##### DEIR/DEIS Text:

**Impact G-5: Project structures could be damaged by problematic soils exposing people or structures to hazards (Class II)**

For solar facilities identified as connected actions, potential hazards could be effectively mitigated by incorporating recommendations contained in required project geotechnical evaluation. As well, structures must meet the requirements of all applicable federal, State, and county permits and building codes. Application of standard design and construction practices and implementation of typical mitigation measures would help avoid damage to project structures as result of problematic soils. Impacts would be less than significant with mitigation (Class II).

##### SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-306

Comment Set F3: Southern California Edison Company (cont.)

Pages D.9-33 through 35

DEIR/DEIS Text:

D.9.4.3 Phased Build Alternative

*Impact G-1: Project structures could be damaged by surface fault rupture at crossings of active and potentially active faults*

*Impact G-2: Project structures could be damaged by seismically induced groundshaking and/or ground failures, such as landslides and liquefaction-related phenomena, exposing people or structures to hazards*

*Impact G-3: Erosion could be triggered or accelerated due to construction activities*

*Impact G-4: Slope instability, such as landslides, could be triggered or accelerated due to construction activities*

*Impact G-5: Project structures could be damaged by problematic soils exposing people or structures to hazards*

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional geology impacts beyond those analyzed for the Phased Build Alternative (in the DEIR/DEIS), and could be greater than those identified for the Proposed Project.

F3-307

### Responses to Comment Set F3 – Section D.9 Geology and Soils

- F3-304 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-305 This comment is similar to Comment F3-304. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-306 This comment is similar to Comment F3-304. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-307 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

**Comment Set F3: Southern California Edison Company (cont.)**

**Section D.10 Hazards and Hazardous Materials**

**Page D.10-4**

**DEIR/DEIS Text:**

Hazardous substances are defined by federal and State regulations to protect public health and the environment.

**SCE Comment:**

For accuracy, please make the following revisions:

Hazardous substances are defined by federal and State regulations in order to protect human health and the environment.

**F3-308**

**Page D.10-5**

**DEIR/DEIS Text:**

Clean Water Act

The United States Environmental Protection Agency (EPA) implements provisions of the CWA through a variety of regulations, including the National Contingency Plan and the Oil Pollution and Prevention Regulations.

**SCE Comment:**

For clarity, please make the following revision:

The United States Environmental Protection Agency (EPA) implements provisions of the CWA through a variety of regulations, including the National Contingency Plan (NCP) and the Oil Pollution and Prevention Regulations.

**F3-309**

**Page D.10-6**

**DEIR/DEIS Text:**

Oil Pollution and Prevention Regulation

The oil pollution regulation contains two major types of requirements: prevention requirements (SPCC Rule) and Facility Response Plan (FRP) requirements.

**SCE Comment:**

SPCC was not previously defined in Section D.10, although it may be defined in previous sections. Please make the following revision:

The oil pollution regulation contains two major types of requirements: prevention requirements (Spill Prevention, Countermeasures, and Control (SPCC)) and Facility Response Plan (FRP) requirements.

**F3-310**

**Page D.10-6**

**DEIR/DEIS Text:**

Porter-Cologne Water Quality Control Act

Porter-Cologne designated the State Water Resources Control Board as the ultimate authority over State water rights and water quality policy and established nine Regional Water Quality Control Boards (RWQCBs) to oversee water quality on a day-to-day basis at the local/regional level.

**SCE Comment:**

This is the first appearance of State Water Resources Control Board, which is later defined as SWRCB. It should be defined at this initial usage, please make the following revision:

Porter-Cologne designated the State Water Resources Control Board (SWRCB) as the ultimate authority over State water rights and water quality policy and established nine Regional Water Quality Control Boards (RWQCBs) to oversee water quality on a day-to-day basis at the local/regional level.

**F3-311**

## Comment Set F3: Southern California Edison Company (cont.)

Page D.10-10

### DEIR/DEIS Text:

#### D.10.3.2 CEQA Significance Criteria

The significance criteria for assessing the impacts to hazardous materials are based on the Environmental Checklist in Appendix G of the CEQA guidelines. An impact would be considered significant if project construction or operation would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The routine storage and use of hazardous materials, principally fuels, lubricants, solvents, and paints at project staging areas, construction sites and substations could result in spills and leaks and the subsequent cleanup and disposal.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Spills and accidental releases of fuel, oil, solvents and other hazardous materials could occur in staging yards, construction sites, substations, and along the transmission line during maintenance that could expose workers and the public to hazardous conditions.
- Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. Project construction of new access roads, transmission structures, and substation upgrades could encounter pre-existing contaminated soil at known hazardous waste sites or at previously unknown spill or waste sites.
- Create a significant hazard to workers that encounter residual pesticides and/or herbicides during grading or excavation in agricultural areas. Project construction on historic, recent or active agricultural land where the presence of residual pesticide and herbicide contamination of the soil could represent a potential health hazard associated with exposure of construction workers and the public to contaminated soil.

### SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

- ~~Create a significant hazard to workers that encounter residual pesticides and/or herbicides during grading or excavation in agricultural areas. Project construction on historic, recent or active agricultural land where the presence of residual pesticide and herbicide contamination of the soil could represent a potential health hazard associated with exposure of construction workers and the public to contaminated soil.~~

F3-312



Comment Set F3: Southern California Edison Company (cont.)

Page D.10-11

DEIR/DEIS Text:

HH-1a: Prepare a Hazardous Materials and Waste Management Plan. ...

**Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet.

**Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in designated areas where absorbent pad and trays are available.

**Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 500 feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

SCE Comment:

Please make the following clarifying revisions, including the reduction of the limitation from waters from 500 feet to 50 feet, as is typical for construction projects.

HH-1a: Prepare a Hazardous Materials and Waste Management Plan. ...

**Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet.

**Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at construction work areas, helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in designated areas where absorbent pad and trays are available.

**Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 500 feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

F3-313

## Comment Set F3: Southern California Edison Company (cont.)

Page D.10-13

### DEIR/DEIS Text:

HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following:

- Identifying impacted soil
- Assessing impacted soil
- Soil excavation
- Impacted soil storage
- Verification sampling
- Impacted soil characterization and disposal

The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted.

The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.

### SCE Comment:

The mitigation measure to prepare a soil management plan is redundant of state, federal, and local requirements already in place. Please replace with the following as an alternative:

~~HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following: • Identifying impacted soil • Assessing impacted soil • Soil excavation • Impacted soil storage • Verification sampling • Impacted soil characterization and disposal. The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether~~

F3-314

Comment Set F3: Southern California Edison Company (cont.)

further assessment is warranted. The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.

HH-2a: Observe exposed soil for evidence of contamination. During grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor shall stop work until the material is properly characterized and appropriate measures are taken to protect human health and the environment. The contractor shall comply with all local, state, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials. Additionally, in the event that evidence of contamination is observed, the contractor shall document the exact location of the contamination and shall notify the CPUC or BLM, describing proposed actions. A weekly report listing encounters with contaminated soils and describing actions taken shall be submitted to the CPUC or BLM.

F3-314  
cont.

### Comment Set F3: Southern California Edison Company (cont.)

Page D.10-14

**DEIR/DEIS Text:**

**HH-3a: Identify pesticide/herbicide contamination.** Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

**SCE Comment:**

To clarify that SCE is only responsible for excavated materials impacted by the project, and to remove redundancies, as the regulatory agencies would be notified of the existence of hazardous materials by the hazardous wastes manifests, SCE suggests the following edits:

**HH-3a: Identify pesticide/herbicide contamination.** Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated project materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). ~~As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options.~~ In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

F3-315

Page D.10-16

**DEIR/DEIS Text:**

**Impact HH-1: Improper handling, storage, or accidental spills or releases of hazardous materials could result in harm to the public, project workers, or the environment (Class II)**

For connected solar projects in the Desert Center and Blythe areas, the potential for improper handling, storage, or accidental spills or releases of hazardous materials to harm to the public, project workers, or the environment would be reduced by implementation of typical mitigation measures. For both the Palen and Desert Harvest projects (CEC, 2014 and BLM, 2012), this impact was found to be less than significant with mitigation (Class II). With implementation of typical mitigation, Impact HH-1 also would be less than significant with mitigation for connected solar PV projects (Class II).

**SCE Comment:**

The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-316

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.10-16 – 17**

**DEIR/DEIS Text:**

***Impact HH-2: Ground disturbance could result in mobilization of contaminants currently existing in the soil, creating potential pathways of exposure to humans or other sensitive receptors (Class II for Proposed Project; Class II or Class III for Connected Actions)***

For the connected actions in the Desert Center area, based on the Phase I Environmental Site Assessment for the Palen Solar Power Project, this impact was found to be less than significant (Class III). For the Desert Harvest Solar Project, this impact was found to be less than significant with mitigation (Class II). For the other connected solar projects in the Desert Center and Blythe areas, Phase I Environmental Site Assessments would be required. The findings of the assessments would establish measures to treat any existing contamination discovered. This impact would be less than significant impact with typical mitigation applied (Class II).

**SCE Comment:**

The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

**Page D.10-17**

**DEIR/DEIS Text:**

***Impact HH-3: Ground disturbance could result in mobilization of pesticides and herbicides in agricultural soils, creating potential pathways of exposure to humans or other sensitive receptors (Class II)***

For connected solar projects, Phase I Site Assessments and implementation of mitigation measures similar to those for the Proposed Project (see Section D.10.3.3) would reduce this impact to less than significant with mitigation (Class II).

**SCE Comment:**

The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

**Pages D.10-20 through 21**

**DEIR/DEIS Text:**

**D.10.4.3 Phased Build Alternative**

**Impact HH-1:** Improper handling, storage, or accidental spills or releases of hazardous materials could result in harm to the public, project workers, or the environment

**Impact HH-2:** Ground disturbance could result in mobilization of contaminants currently existing in the soil, creating potential pathways of exposure to humans or other sensitive receptors

**Impact HH-3:** Ground disturbance could result in mobilization of pesticides and herbicides in agricultural soils, creating potential pathways of exposure to humans or other sensitive receptors

**SCE Comment:**

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional hazards and hazardous materials impacts beyond those analyzed for the Phased Build Alternative and could be greater than those identified for the Proposed Project.

**F3-317**

**F3-318**

**F3-319**

## Comment Set F3: Southern California Edison Company (cont.)

Page D.10-24

Table D.10-1. Mitigation Monitoring Program – Hazards and Hazardous Materials

HH-1a: Prepare a Hazardous Materials and Waste Management Plan. ...

- **Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet.
- **Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in designated areas where absorbent pad and trays are available.
- **Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 500 feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

### SCE Comment:

Please see recommended clarifying edits, including the reduction of the limitation from waters from 500 feet to 50 feet, as is typical for construction projects:

Table D.10-1. Mitigation Monitoring Program – Hazards and Hazardous Materials

HH-1a: Prepare a Hazardous Materials and Waste Management Plan. ...

- **Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet.
- **Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at construction work areas, helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in designated areas where absorbent pad and trays are available.
- **Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 500 feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

F3-320



Comment Set F3: Southern California Edison Company (cont.)

Page D.10-24

HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following:

- Identifying impacted soil
- Assessing impacted soil
- Soil excavation
- Impacted soil storage
- Verification sampling
- Impacted soil characterization and disposal

The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted.

The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.

SCE Comment:

The mitigation measure to prepare a soil management plan is redundant of state, federal and local requirements already in place. Please replace with the following as an alternative:

HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following:

- Identifying impacted soil
- Assessing impacted soil
- Soil excavation
- Impacted soil storage
- Verification sampling
- Impacted soil characterization and disposal

The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of

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**Comment Set F3: Southern California Edison Company (cont.)**

occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted.

The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.

HH-2a: Observe exposed soil for evidence of contamination. During grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor shall stop work until the material is properly characterized and appropriate measures are taken to protect human health and the environment. The contractor shall comply with all local, state, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials. Additionally, in the event that evidence of contamination is observed, the contractor shall document the exact location of the contamination and shall notify the CPUC or BLM, describing proposed actions. A weekly report listing encounters with contaminated soils and describing actions taken shall be submitted to the CPUC or BLM.

**F3-321  
cont.**



Comment Set F3: Southern California Edison Company (cont.)

Page D.10-24

DEIR/DEIS Text:

**HH-3a: Identify pesticide/herbicide contamination.** Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

SCE Comment:

To clarify that SCE is only responsible for excavated materials impacted by the project, and to remove redundancies, as the regulatory agencies would be notified of the existence of hazardous materials by the hazardous wastes manifests, please make the following revisions:

**HH-3a: Identify pesticide/herbicide contamination.** Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated ~~project~~ materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures ~~consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan).~~ As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

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### Responses to Comment Set F3 – Section D.10 Hazards and Hazardous Materials

- F3-308 The commenter suggests a minor edit in the first sentence of Section D.10.2 (Hazards and Hazardous Materials, Applicable Regulations, Plans, and Standards). The edit, namely changing “public” to “human” health, has been made in the EIS.
- F3-309 The commenter suggests inserting an acronym in the Clean Water Act discussion in Section D.10.2.1. The textual edit has been made in the EIS.
- F3-310 The commenter suggests spelling out an acronym in the Oil Pollution and Prevention Regulation discussion in Section D.10.2.1. The textual edit has been made in the EIS.
- F3-311 The commenter suggests inserting an acronym in Porter-Cologne Water Quality Control Act discussion in Section D.10.2.2. The textual edit has been made in the EIS.
- F3-312 The commenter questions the validity of significance criteria that are not found in Appendix G of the CEQA Guidelines, including the specific criterion in Section D.10.3.2 (CEQA Significance Criteria) of the Draft EIR/EIS related to encountering residual pesticides and/or herbicides in agricultural areas. See Response to Comment F3-95 with regard to the use of significance criteria.
- F3-313 The commenter requests revisions in Section D.10 (Hazards and Hazardous Materials) to Mitigation Measure HH-1a (Prepare a Hazardous Materials and Waste Management Plan). The suggested edits for clarity have been made in the mitigation measure. The request to reduce the distance between fueling locations and drains or waterways to 50 feet was considered but not accepted. However, the original 500-foot separation distance is revised in Mitigation Measure HH-1a to 75 feet from dry drains and waterways and 200 feet from drains and waterways with flowing water.
- F3-314 The commenter requests deletion of Mitigation Measure HH-2a (Prepare a Soil Management Plan) and offers a substitute. The commenter is correct in stating that there are state, federal, and local requirements in place to address the subject of hazardous materials. However, Mitigation Measure HH-2a provides for a Plan that would identify how these would be applied to the Proposed Project, and the Plan provides a single reference and guide for managing contaminated soil, if encountered. Mitigation Measure HH-2a is unchanged.
- F3-315 The commenter requests revisions to Mitigation Measure HH-3a (Identify pesticide/herbicide contamination). The request is to delete reference to Mitigation Measure HH-2a (Prepare a Soil Management Plan) and to contact various agencies for oversight on handling, treatment, and/or disposal options. The reference to Mitigation Measure HH-2a remains. However, because of the requirement in Mitigation Measure HH-2a and existing state and local regulations, the requirement for contacting agencies is deleted as being redundant.
- F3-316 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-317 This comment is similar to Comment F3-316. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-318 This comment is similar to Comment F3-316. See Response to Comment F3-102 with regard to mitigation for connected actions.

- F3-319 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-320 This comment is similar to Comment F3-313. See Response to Comment F3-313 regarding Mitigation Measure HH-1a.
- F3-321 This comment is similar to Comment F3-314. See Response to Comment F3-314 regarding Mitigation Measure HH-2a.
- F3-322 This comment is similar to Comment F3-315. See Response to Comment F3-315 regarding Mitigation Measure HH-3a.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.11 Land Use and BLM Realty

Page D.11-2

DEIR/DEIS Text:

F3-323

Table D.11-2. General Plan Land Uses for the Proposed Project by Jurisdiction (acres)

Jurisdiction	Agricult	Commer	Industri	Office	Open Space	Public Facilities	Resident	Speci fic	Transp ortation	Total
Banning	81.6	7.6	36.2	44.4	152.3	4.6	155.3	0.0	0.0	482.0
Beaumont	0.0	9.3	0.0	0.0	123.4	0.0	115.9	0.6	0.0	249.3
Calimesa	0.0	7.6	0.0	0.0	0.0	0.0	20.2	111.3	0.0	139.1
Colton	0.0	0.0	0.0	0.0	0.0	0.0	0.0	71.3	0.0	71.3
Grand Terrace	0.0	0.0	0.0	0.0	0.0	0.0	5.9	0.0	0.0	5.9
Loma Linda	0.0	7.9	1.6	9.6	141.9	0.0	15.7	153.9	3.8	334.4
Palm Springs	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rancho	0.0	0.0	12.7	0.0	0.0	0.0	0.0	0.0	0.0	12.7
Redlands	0.8	55.6	2.1	0.0	133.4	14.9	0.0	0.0	0.0	206.7
San Bernardino	0.0	0.0	0.0	0.0	0.0	0.0	3.1	0.0	0.0	3.1
Yucaipa	0.0	0.0	0.0	0.0	0.0	0.0	1.9	2.0	0.0	1.9
County of	0.0	20.4	307.1	0.0	937.0	245.3	424.8	0.2	3.1	1,937.7
County of San	0.0	67.2	38.4	3.8	16.7	1.8	53.3	0.0	3.3	184.5
TOTAL	82.4	175.5	385.4	57.8	1,504.7	266.5	794.2	337.3	10.2	3,611.0

1 - Acreage of Etiwanda Substation

2 - Acreage of Tennessee Substation

SCE Comment:

Please remove the following references to Tennessee Substation and Yucaipa.

Table D.11-2. General Plan Land Uses for the Proposed Project by Jurisdiction (acres)

Jurisdiction	Agricultura	Commercia	Industrial	Office	Open Space	Public Facilities	Residentia	Specifi c	Transpor tation	Total
Banning	81.6	7.6	36.2	44.4	152.3	4.6	155.3	0.0	0.0	482.0
Beaumont	0.0	9.3	0.0	0.0	123.4	0.0	115.9	0.6	0.0	249.3
Calimesa	0.0	7.6	0.0	0.0	0.0	0.0	20.2	111.3	0.0	139.1
Colton	0.0	0.0	0.0	0.0	0.0	0.0	0.0	71.3	0.0	71.3
Grand Terrace	0.0	0.0	0.0	0.0	0.0	0.0	5.9	0.0	0.0	5.9
Loma Linda	0.0	7.9	1.6	9.6	141.9	0.0	15.7	153.9	3.8	334.4
Palm Springs	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rancho Cucamonga	0.0	0.0	12.7	0.0	0.0	0.0	0.0	0.0	0.0	12.7
Redlands	0.8	55.6	2.1	0.0	133.4	14.9	0.0	0.0	0.0	206.7
San Bernardino	0.0	0.0	0.0	0.0	0.0	0.0	3.1	0.0	0.0	3.1
Yucaipa	0.0	0.0	0.0	0.0	0.0	0.0	1.9	2.0	0.0	1.9
County of Riverside	0.0	20.4	307.1	0.0	937.0	245.3	424.8	0.2	3.1	1,937.9
County of San Bernardino	0.0	67.2	38.4	3.8	16.7	1.8	53.3	0.0	3.3	184.5
TOTAL	82.4	175.5	385.4	57.8	1,504.7	266.5	794.2	337.3	10.2	3,611.0

1 - Acreage of Etiwanda Substation

2 - Acreage of Tennessee Substation

Comment Set F3: Southern California Edison Company (cont.)

Page D.11-11

LU-1a: Prepare construction notification plan. Sixty days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components:

Public notice mailer. No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.

Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities.

Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

**SCE Comment:**

To ensure that the mitigation measure can be implemented successfully, please make the following revisions:

**LU-1a Prepare construction notification plan.** Sixty ~~forty-five~~ days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components: **Public notice mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of

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**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

construction active-ties that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. ~~If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.~~ Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction.

Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities. Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

**F3-324**  
**cont.**

Comment Set F3: Southern California Edison Company (cont.)

Page D.11-10

DEIR/DEIS Text:

For the purposes of this Land Use analysis, land use impacts may be significant if the Proposed Project would:

- Directly or indirectly disrupt an established or recently approved land use

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

- ~~Directly or indirectly disrupt an established or recently approved land use~~

F3-325

Page D.11-13

DEIR/DEIS Text:

*Impact LU-1: Project would disrupt on established or recently approved land use (Class II)*

Construction and operation of the connected solar projects could temporarily disrupt some existing land uses, including recreation and agriculture, and would cause temporary impacts related to traffic, noise, and aesthetics. With implementation of Mitigation Measure LU-1a (Prepare construction notification plan) and the mitigation measures identified above, this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-326

Pages D.11-15 through 16

DEIR/DEIS Text:

**D.11.4.3 Phased Build Alternative**

*Impact LU-1: Project would disrupt on established or recently approved land use*

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study. The additional disturbance areas and the increased duration could result in additional land use impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

F3-327



### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.11-18

#### DEIR/DEIS Text:

LU-1a: Prepare construction notification plan. Sixty days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components:

**Public notice mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.

**Newspaper advertisements.** Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. **Public venue notices.** Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities.

**Public liaison person and toll-free information hotline.** SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

#### SCE Comment:

To ensure that the mitigation measure can successfully be implemented, please make the following revisions:

**LU-1a Prepare construction notification plan.** ~~Sixty~~ **Forty-five** days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components: **Public notice mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential proper-ties, retail and commercial businesses, wilderness and recreation facilities,

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**Comment Set F3: Southern California Edison Company (cont.)**

and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. ~~If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.~~ Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction.

Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities.

Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

**F3-328**  
**cont.**

### Responses to Comment Set F3 – Section D.11 Land Use and BLM Realty

- F3-323 The commenter identifies that with removal of Timoteo and Tennessee Substations, information in Table D.11-2 needs to be updated. In Section D.11 (Land Use and BLM Realty), Table D.11-2 has been edited to show that Tennessee Substation in Yucaipa has been removed from the Project.
- F3-324 The commenter suggests that in situations where construction is delayed more than seven days at properties where access would be affected by the construction that the requirement in Mitigation Measure LU-1a (Prepare construction notification plan) for preparing and distributing a new notice be omitted. Also, that the notification plan be provided to CPUC and BLM 45 days prior to construction rather than 60 days.
- Mitigation Measure LU-1a has been amended to require submission of the plan 45 days prior to construction. For properties where access would be affected by construction, the requirement for re-notification of property owners if construction is delayed is modified to state that affected property owners will be notified of such delays, with the method of notification up to the utility.
- F3-325 The commenter requests removal of a significance criterion for land use disruption, stating that it does not appear in CEQA guidelines. This is a comment on CEQA, not NEPA. See Response to Comment F3-95. Significance criteria are not limited to those found in CEQA guidelines.
- F3-326 This comment request clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-327 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-328 This is the same as Comment F3-324. Please see Response to Comment F3-324

## Comment Set F3: Southern California Edison Company (cont.)

### Section D.12 Mineral Resources

#### Page D.12-7

##### DEIR/DEIS Text:

**MR-1a Coordinate with quarry operations.** Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared in conjunction with the quarry operators prior to construction. Prior to construction in the quarry area, SCE shall provide CPUC and BLM documentation that an agreement has been reached with the quarry

##### SCE Comment:

SCE's APM MIN-1 was not mitigating an impact and was included simply to note that coordination would occur with the quarry. It should be noted that SCE's typical property rights would support the construction regardless of mining activities.

SCE recommends the following language be included in the mitigation measure:

**MR-1a: Coordinate with quarry operations.** Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared by SCE documenting how coordination with the quarry operators is expected to occur, in conjunction with the quarry operators prior to construction. Prior to construction in the quarry area, SCE shall provide CPUC and BLM a copy of this plan, documentation that an agreement has been reached with the quarry

F3-329

#### Page D.12-8

##### DEIR/DEIS Text:

**Impact MR-1: Construction activities would render known mineral resources inaccessible (Class II)**

For the connected solar projects, as with the Proposed Project, construction impacts to known mineral resources would be temporary and would not result in the loss of availability of those resources. Mitigation Measure MR-1a (Coordinate with quarry operations) would reduce the potential to interfere with quarry (or mining) operations and render mineral resources temporarily inaccessible by coordination with operators and preparation of a plan to minimize interference with plant operations. This impact would be less than significant with mitigation (Class II).

##### SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-330

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.12-9 through 10

DEIR/DEIS Text:

D.12.4.3 Phased Build Alternative

*Impact MR-1: Construction activities would render known mineral resources inaccessible*

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional mineral impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

F3-331

Page D.12- 11

DEIR/DEIS Text:

**MR-1a Coordinate with quarry operations.** Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared in conjunction with the quarry operators prior to construction. Prior to construction in the quarry area, SCE shall provide CPUC and BLM documentation that an agreement has been reached with the quarry

SCE Comment:

SCE's APM MIN-1 was not mitigating an impact and was included simply to note that coordination would occur with the quarry. It should be noted that SCE's typical property rights would support the construction regardless of mining activities.

SCE recommends the following language be included in the mitigation measure:

**MR-1a: Coordinate with quarry operations.** Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared by SCE documenting how coordination with the quarry operators is expected to occur, in conjunction with the quarry operators prior to construction. Prior to construction in the quarry area, SCE shall provide CPUC and BLM a copy of this plan, documentation that an agreement has been reached with the quarry

F3-332

**Responses to Comment Set F3 – Section D.12 Mineral Resources**

- F3-329 The commenter suggests a textual revision of Mitigation Measure MR-1a. The Mitigation Measure MR-1a in Section D.12 has been revised, allowing SCE to prepare a plan to avoid or minimize interference with mining operations in coordination with the mine operator, rather than in conjunction with the operator.
- F3-330 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-331 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-332 This comment is similar to Comment F3-329. See Response to Comment F3-329 regarding Mitigation Measure MR-1a.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.13 Noise

#### Page D.13-14

##### DEIR/DEIS Text:

SCE's description of the project does not include rock blasting or use of explosives for any portion of construction. Similarly, the project does not include splicing conductors through the use of implosive sleeves, which detonate explosives to fuse the conductors. However, if these construction methods were used, they would create instantaneous or short-term noise.

##### SCE Comment:

SCE's Proponent's Environmental Assessment (PEA) included a description of potential rock blasting as well as the potential use of implosive sleeves (SCE 2013, p 4.12-32). For consistency with SCE's PEA, please modify as follows:

SCE's description of the project ~~does not include the potential for rock blasting and/or use of explosives for implosive sleeves during or use of explosives for any portion of construction. Similarly, the project does not include splicing conductors through the use of implosive sleeves, which detonate explosives to fuse the conductors.~~ However, if these construction methods are used, they would create instantaneous or short-term noise.

F3-333

#### Page D.13-14

##### DEIR/DEIS Text:

Construction of foundations for new towers, poles, and shoo-fly structures would require use of a drill rig or large auger at each location. Pile driving would not be needed. Access and spur roads would require use of graders, compactors, dozers, and trucks.

##### SCE Comment:

Currently the SCE civil designs include the installation of soldier pile walls which require the use of pile driving equipment. Please modify the DEIR/DEIS language as follows:

Construction of foundations for new towers, poles, and shoo-fly structures would require use of a drill rig or large auger at each location. Pile driving equipment could be used for the installation of soldier pile-type retaining walls, though most are expected to be drilled piers. ~~would not be needed.~~ Access and spur roads would require use of graders, compactors, dozers, and trucks.

F3-334

Comment Set F3: Southern California Edison Company (cont.)

Page D.13-16

DEIR/DEIS Text:

Table D.13-6. Construction Noise Levels Modeled for Specific Locations (dBA)

Location	Typical Receptor Distance (ft)	Receptor Jurisdiction	Lmax (dBA)	Leq (dBA)
San Bernardino Substation	875	Redlands	59.5	52.3
Vista Substation	50	Grand Terrace	84.4	83.3
El Casco Substation	950	Calimesa	55.1	49.5
Devers Substation	1,000	Riverside County	58.4	50.3
Etiwanda Substation	50	Rancho Cucamonga	75.0	71.0
Timoteo Substation	50	Loma Linda	77.6	77.3
Tennessee Substation	50	Yucaipa	77.6	77.3
Telecommunications Facilities	50	Typical Facilities	77.6	76.8

Source: SCE, 2013 (PEA Appendix K).

SCE Comment:

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations:

<del>Timoteo Substation</del>	<del>50</del>	<del>Loma Linda</del>	<del>77.6</del>	<del>77.3</del>
<del>Tennessee Substation</del>	<del>50</del>	<del>Yucaipa</del>	<del>77.6</del>	<del>77.3</del>

Page D.13-16

DEIR/DEIS Text:

Helicopter operations, especially if necessary at night to string conductor across the highways, would likely cause annoyance to residences in the vicinity.

SCE Comment:

Helicopters will not be used at night for construction of the WOD Upgrade Project; please make the following revision: Helicopter operations, especially if necessary at night to string conductor across the highways, would likely cause annoyance to residences in the vicinity.

Page D.13-16

DEIR/DEIS Text:

Safety precautions may require homes near helicopter activity to be temporarily vacated, and this would help to minimize exposure of residents to helicopter noise.

SCE Comment:

Please make the following clarifying edits:

In areas where safety precautions may require homes near helicopter activity to be temporarily vacated, SCE will utilize other methods to conduct the work that do not require helicopters in these locations, and this would help to minimize exposure of residents to helicopter noise.

F3-335

F3-336

F3-337

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.13-17**

**DEIR/DEIS Text:**

SCE identifies two specific helicopter models that would be used, the Bell 500 (MD 500) and the Kaman Kmax, which carries loads.

**SCE Comment:**

In the PEA, SCE referenced these two helicopters as models that would be “assumed” to be used for the purpose of impact analysis. The actual helicopter models used will be equivalent to those “assumed” for the purposes of analysis, i.e., light and medium duty helicopters. Please make the following revision:

SCE identifies two specific helicopter models that would be typically used, the Bell 500 (MD 500) and the Kaman Kmax, which carries loads.

**F3-338**

**Page D.13-17**

**DEIR/DEIS Text:**

With implementation of the recommended mitigation measures, the construction activities would either comply with local noise ordinances, or SCE would request a variance from each affected jurisdiction.

**SCE Comment:**

Please see SCE’s accompanying cover letter for additional discussion related to reasons why the requirement to obtain a variance from local jurisdictions for noise impacts should be stricken or revised. Given the CPUC’s preemptive authority, please delete the reference to local noise variances: With implementation of the recommended mitigation measures, the construction activities would either comply with local noise ordinances, or SCE would inform the CPUC, BLM, and the impacted local jurisdiction of the potential for conflict with local noise ordinances.

**F3-339**

**Page D.13-18**

**DEIR/DEIS Text:**

***Mitigation Measures for Impact N-1***

Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction.

**SCE Comment:**

Please see SCE’s accompanying cover letter for additional discussion related to reasons why the requirement to obtain a variance from local jurisdictions for noise impacts should be stricken or revised, and as noted if the language is not removed, SCE proposes revised language, as follows:

***Mitigation Measures for Impact N-1***

Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances.

**F3-340**



Comment Set F3: Southern California Edison Company (cont.)

Page D.13-18

DEIR/DEIS Text:

Table D.13-9 presents the mitigation monitoring program for noise.

Table D.13-9. Mitigation Monitoring Program – Noise

MITIGATION MEASURE

**N-1a: Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- Stationary noise sources (e.g., generators, pumps) and staging areas shall be shielded from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts.
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible.
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

SCE Comment:

For consistency with the edits suggested in prior comments, please make the following revisions:

**N-1a: Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- If noise levels at the adjacent noise sensitive receptor location exceed applicable jurisdictional criteria, stationary noise sources (e.g. generators, pumps) and at staging areas and on the ROW shall be shielded at the source to the extent necessary to meet the jurisdictional noise levels, if feasible, from adjacent noise sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, When utilized and if feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cuts.
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible.
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

F3-341

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page D.13-18

#### DEIR/DEIS Text:

**N-1b: Implement a helicopter noise control strategy.** As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering within 250 feet of residences.

#### SCE Comment:

SCE is requesting that additional clarification relating to the duration of hovering be included in the mitigation measure to be consistent with SCE's PEA Volume 3, Page 4.12-26. Additionally, as the analysis suggests, the use of helicopter noise could only exceed local noise standards within the City of Banning and Calimesa, therefore it is appropriate that the mitigation measure be revised to specify that it only applies to helicopter use within those two jurisdictions:

Please make the following revision:

**N-1b: Implement a helicopter noise control strategy.** As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet radial distance of residences. The noise control strategy should be applied to helicopter construction within the cities of Banning and Calimesa.

F3-342

### Page D.13-18

#### DEIR/DEIS Text:

The description of the project (Section B, Description of Proposed Project) does not include use of explosives or blasting that could cause ground-borne vibration at levels capable of causing structural damage to buildings in the immediate vicinity. Other construction activities would not involve sources likely to cause any structural damage outside of the work areas. No impact-pile driving would occur.

#### SCE Comment:

As described in previous comments, the project may include blasting, the use of explosives for implosive sleeves, and pile driving. Please make the following revisions:

The description of the Proposed Project (Section B, Description of Proposed Project) does not include may include the use of explosives or blasting that could cause ground-borne vibration; these would not be expected to be at levels capable of causing structural damage to buildings in the immediate vicinity. Other construction activities would not involve sources likely to cause any structural damage outside of the work areas. No impact-pile driving would occur.

F3-343

### Page D.13-22

#### DEIR/DEIS Text:

D.13.3.5 CEQA Significance Determination for Proposed Project and Connected Actions

Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances (Class I)

#### SCE Comment:

As noted in the WOD PEA, the Proposed Project's construction activities would typically occur during the time periods allowed by the local jurisdiction's municipal code. Therefore, construction noise generated by the Proposed Project would result in less than significant impacts related to the exposure of persons to or generation of noise levels in excess of standards established in the local general plan, local noise ordinance, or applicable standards of other agencies.

F3-344

Comment Set F3: Southern California Edison Company (cont.)

Page D.13-23

DEIR/DEIS Text:

**Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances (Class I)**

For connected actions in the Desert Center and Blythe areas, construction noise would be temporary and would be reduced by implementation of typical mitigation measures. Temporary construction noise was found less than significant with mitigation for both the Palen Solar Power Project and Desert Harvest Solar Project (Class II). For the other solar projects, where their locations are not known, construction noise occurring at the perimeter of the other solar projects would be the primary source of disruption to the nearest receptor. The level of construction noise could occasionally be substantially higher than ambient noise levels if sensitive receptors are located adjacent to the work area. Mitigation would reduce the impact, but could violate local rules, standards, or ordinances. Further, construction may be required outside usually allowed hours under the applicable noise regulation. Therefore, Impact N-1 is considered significant and unavoidable for confidential connected actions (Class I).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Pages D.13-28 through 29

DEIR/DEIS Text:

D.13.4.3 Phased Build Alternative

Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances

Impact N-2: Construction activity would temporarily cause groundborne vibration

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional noise impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

Page D.13-29

DEIR/DEIS Text:

SCE Comment:

Corona noise levels at the edge of the ROW would be less than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) would not substantially increase due to corona noise for any segment of the Phased Build Alternative

SCE Comment:

Because of the reduced conductor size selected for the Phased Build Alternative, the conductor surface voltage gradient will be greater than it would be for the Proposed Project, therefore, the corona noise generated by the conductor will certainly be greater. However, when combined with other ambient noise, it is uncertain how much, if any, total noise would actually increase. Please make the following revisions:

Corona noise levels at the edge of the ROW would be greater less than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) could ~~would not substantially increase~~ due to corona noise for any segment of the Phased Build Alternative.

F3-345

F3-346

F3-347

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.13-30

**DEIR/DEIS Text:**

Corona noise levels at the edge of the ROW would be less than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) would not substantially increase due to corona noise for any segment of the Phased Build Alternative

**SCE Comment:**

Because of the reduced conductor size selected for the Phased Build Alternative, the conductor surface voltage gradient will be greater than it would be for the Proposed Project, therefore, the corona noise generated by the conductor will certainly be greater. However, when combined with other ambient noise, it is uncertain how much, if any, total noise would actually increase. Please make the following revisions:

Corona noise levels at the edge of the ROW would be greater less than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) could ~~would not substantially~~ increase due to corona noise for any segment of the Phased Build Alternative.

F3-348

Comment Set F3: Southern California Edison Company (cont.)

Page D.13-32

DEIR/DEIS Text:

Table D.13-9 presents the mitigation monitoring program for noise. Table D.13-9. Mitigation Monitoring Program – Noise

MITIGATION MEASURE

**N-1a: Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- Stationary noise sources (e.g., generators, pumps) and staging areas shall be shielded from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts.
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible.
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

SCE Comment:

Consistent with previous comments, please modify language to the following bullet points 1 and 3:

**N-1a: Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- If noise levels at the adjacent noise sensitive receptor location exceed applicable jurisdictional criteria, Stationary noise sources (e.g. generators, pumps) and at staging areas and on the ROW shall be shielded at the source to the extent necessary to meet the jurisdictional noise levels, if feasible. from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, When utilized and if feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cuts.
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

F3-349

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.13-

DEIR/DEIS Text:

MITIGATION MEASURE

**N-1b: Implement a helicopter noise control strategy.** As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering within 250 feet of residences.

**SCE Comment:**

SCE is requesting additional clarification relating to the duration for hovering be included in the mitigation measure to be consistent with SCE's PEA Volume 3, Page 4.12-26. Additionally, as the analysis suggests the use of helicopter noise could only exceed local noise standards within the City of Banning and Calimesa, therefore it is appropriate that the mitigation measure be revised so implementation is specific to only helicopter use within those two jurisdictions:

Please make the following revision:

**N-1b: Implement a helicopter noise control strategy.** As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet radial distance of residences. The noise control strategy should be applied to helicopter construction within the cities of Banning and Calimesa.

F3-350



### Responses to Comment Set F3 – Section D.13 Noise

- F3-333 The commenter clarifies that rock blasting or use of explosives may occur, although this information did not appear in the original description of the project. To reflect this change, the project description (EIS Section B.3.3.3, Foundation Installation and Section B.3.3.11, Transmission Wire Pulling and Splicing Locations) includes modifications. The noise impact discussion is also modified in the EIS as follows. The second paragraph of Impact N-1 (Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances) in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) and the description of Impact N-2 (Construction activity would temporarily cause groundborne vibration) have been modified to indicate the potential use of blasting and explosives.
- F3-334 SCE clarifies that its current designs for foundations include the installation of soldier pile walls requiring the use of pile driving equipment, although this information did not appear in the original description of the project. To reflect this change, the project description (EIS Section B.3.3.1, Access, Spur, and Temporary Roads) includes modifications. The noise impact discussion is also modified in the EIS as follows. The first paragraph of Impact N-1 (Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances) in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) and the description of Impact N-2 (Construction activity would temporarily cause groundborne vibration) have been modified to indicate the potential use of pile driving equipment.
- F3-335 The commenter states that Timoteo and Tennessee Substations are no longer needed to support the project. Table D.13-6 (Construction Noise Levels Modeled for Specific Locations (dBA)) has been modified, removing these substations.
- F3-336 The commenter states that helicopters will not be used at night for construction and requests modification of the text to eliminate a statement about night stringing of conductor. The text has been modified in the description of the Proposed Project (in Section B.3.3.15, Helicopter Use and Section B.3.9, Construction Workforce and Equipment) and under the Helicopters discussion in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) to indicate this.
- F3-337 The commenter clarifies that in areas where safety precautions may require vacating homes for helicopter operations, the utility would use other methods to conduct work and would not use helicopters. The text has been modified under the Helicopters discussion in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) to indicate this, omitting discussion of temporarily vacating homes. See also Response to Comment A4-9 which addresses helicopter use near and over structures.
- F3-338 The commenter requests that the helicopters it identified in the PEA and the EIS (the Bell 500 and the Kmax) are "typical" helicopters used. The text has been modified in the description of the Proposed Project (in Section B.3.3.15, Helicopter Use) and under the Helicopters discussion in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) to indicate this.
- F3-339 This comment references SCE's cover letter discussion of noise and night work variances and requests that the requirement for variances be stricken. See Response to Comment F1-2, which addresses this topic.
- F3-340 This comment continues about local noise variances. See Response to Comment F1-2, which addresses this topic.

F3-341 This comment continues about local noise variances. See Response to Comment F1-2, which addresses this topic.

F3-342 The commenter requests that Mitigation Measure N-1b (Implement a helicopter noise control strategy) be amended to include specific hover times and approach distances at residences, and to apply the mitigation measure only within the cities of Banning and Calimesa.

SCE has identified various construction yards it may use for storage, staging, and assembly of project components. Some yards would include helicopter flights in and out. Additionally, SCE has identified that it may land helicopters on the ROW as well as access and spur roads. However, SCE has not identified where helicopter construction would occur and where it would not occur. It is recognized by BLM that such decisions often are made by the contractor during the course of construction and may be difficult to identify well in advance. Consequently, it must be assumed that helicopter-aided construction may occur anywhere along the project ROW and that helicopter traffic may occur between construction yards, airports, and locations on and near the ROW. In light of this, limiting the applicability of Mitigation Measure N-1b to two cities is not reasonable. Because FAA does not permit carrying of external loads over structures, it is not anticipated that structures and persons in those structures would be at high risk from a load lost in flight; however, persons who are near a hovering helicopter would be subject to noise and, possibly, downwash. SCE's PEA analysis of noise assumed helicopters lowering people and equipment to the top of a 100-foot pole using a 150-foot leash, meaning that the helicopter would be 250 feet above the ground. The PEA does not evaluate the delivery and placement of tower or pole sections, which would be less than 100 feet tall, or describe how these would be suspended from the helicopter. Based on previous transmission line construction employing helicopters, during delivery of tower or pole sections (in particular base sections) or pieces of equipment the helicopter could be less than 250 feet above the ground.

The amendments requested by SCE would allow hovering for up to 15 minutes within a 250 foot radial distance of residences. Or, in other words, the comment suggests allowing helicopter use closer than 250 feet as long as the duration is under 15 minutes. This would undermine the purpose of the mitigation measure. No change in the mitigation is necessary because as the measure is written, brief durations of operation within the distance of 250 feet are not precluded.

For clarity, Mitigation Measure N-1b is amended with regard to defining the radial (vertical and horizontal) distance within which a helicopter cannot hover as being 250 feet "in any vertical or horizontal direction." The other requested amendments to the mitigation measure have not been made.

F3-343 This comment follows from Comment F3-333 regarding explosives and suggests text modifications regarding vibration. See Responses to Comments F3-333 and F3-334.

F3-344 The commenter feels that Impact N-1 (Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances) would be less than significant. BLM does not agree. See Response to Comment F3-342 regarding helicopter hovering and noise, and Response to Comment F1-2 regarding SCE's request regarding variances. Close helicopter work, other heavy-equipment construction activities, which include rock blasting and pile driving, and night work could result in noise impacts to sensitive receptors that would remain significant and unavoidable, as shown in Section D.13.3.5. A variance for



night work would allow the work, but the impact would remain as the noise levels may still exceed the existing standards. Having a variance does not mean an impact does not occur. Likewise, allowing helicopter hovering in the vicinity of residences does not mean the impact caused by the noise is less than significant; it can be significant but allowed under certain circumstances.

- F3-345 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-346 The commenter states that there are additional impacts associated with the Phased Build Alternative that were not addressed in the Draft EIR/EIS. Please see General Response GR-4.
- F3-347 This comment states that the audible corona noise level at the surface of the conductor in the Phased Build Alternative would be greater than that of the conductor in the Proposed Project. The text has been modified to reflect the potential difference in noise source levels, which would have an effect that is somewhat offset by the greater distances of the lines in the Phased Build Alternative from the edge of the ROW when compared with the lines in the Proposed Project.
- F3-348 This comment with regard to corona noise is similar to Comment F3-347. See Response to Comment F3-347.
- F3-349 This comment requests revisions to Mitigation Measure N-1a (Implement best management practices for construction noise) and is similar to Comment F1-2. See Response to Comment F1-2, which addresses the need for variances.
- F3-350 This comment with regard to Mitigation Measure N-1b (Implement a helicopter noise control strategy) is similar to Comment F3-342. See Response to Comment F3-342.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.14 Paleontological Resources

#### Page D.14-2

##### DEIR/DEIS Text:

First paragraph, 3<sup>rd</sup> line of D.14.1.1 Regional Setting and Approach to Data Collection  
Paleontological resources, or fossils are the evidence of once-living organisms preserved in the rock record

##### SCE Comment:

Please revise as follow:

Paleontological resources, or fossils are the evidence of once-living organisms preserved in the ~~rock~~ geologic record

F3-351

#### Page D.14-16

##### DEIR/DEIS Text:

First sentence of the first paragraph.

The loss of any identifiable fossil that could yield information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

##### SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided.

Please revise as follows:

Significant paleontological resources are defined as "identifiable" vertebrate fossils, uncommon invertebrates, and plants, and trace fossils that provide a critical piece of paleobiological or geologic data, illustrate a geological principle, or occupy a unique stratigraphic position (SVP, 2010). The loss of any significant identifiable fossil-paleontological resource that could, which, yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

F3-352

#### Page D14-18

##### DEIR/DEIS Text:

*Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources*

##### SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

*Impact PAL-1: Construction of the project ~~would~~could destroy or disturb significant paleontological resources.*

F3-353

#### Page D14-18

##### DEIR/DEIS Text:

Under heading Impact PAL-1:

Construction within these segments has the potential to destroy valuable resources, and mitigation is required.

##### SCE Comment:

The CEQA criteria relates to significance rather than value. Please revise as follows:

Construction within these segments has the potential to destroy or disturb significant paleontological valuable resources, and mitigation is required

F3-354

Comment Set F3: Southern California Edison Company (cont.)

Page D14-18

DEIR/DEIS Text:

*Mitigation Measures for Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources*

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

*Mitigation Measures for Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources*

F3-355

Page D14-19

DEIR/DEIS Text:

PAL-1b 4<sup>th</sup> bullet:

The Plan shall define monitoring procedures and methodology, and shall specify that sediments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. The Qualified Paleontological Monitor shall have at least a B.S in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material.

SCE Comment:

SCE suggests deleting the last sentence of this bullet and creating a separate bullet for qualification of monitors under PAL-1d

Monitor construction for paleontological resources (see below). Please revise as follows:

The Plan shall define monitoring procedures and methodology, and shall specify that sediments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. ~~The Qualified Paleontological Monitor shall have at least a B.S in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material.~~

F3-356

Page D14-19

DEIR/DEIS Text:

PAL-1c Starting on the 5<sup>th</sup> line:

Training shall inform all construction personnel that Environmentally Sensitive Areas (ESAs) include areas determined to paleontologically sensitive as defined on the paleontological sensitivity maps for the project, and must be avoided and that travel and construction activity must be confined to designated roads and areas.

SCE Comment:

An ESA is an exclusion zone that cannot be entered. All paleontological sensitive areas are not automatically an ESA. Please revise as follows:

Training shall inform all construction personnel that designated Environmentally Sensitive Areas (ESAs) ~~include areas determined to paleontologically sensitive as defined on the paleontological sensitivity maps for the project,~~ and must be avoided and that travel and construction activity must be confined to designated roads and areas.

F3-357

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D14-20**

**DEIR/DEIS Text:**

**PAL-1c**

All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.

**SCE Comment:**

SCE contracts for construction require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please remove this measure as follows:

**PAL-1e**

~~All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.~~

**Page D14-20**

**DEIR/DEIS Text:**

**PAL-1d**

Sediments of very low (PFYC 1), low (PFYC 2), or unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as determined by the Qualified Paleontologist).

**SCE Comment:**

There is no justification to require monitoring of very low (PFYC 1) or low (PFYC 2) sediments. Per SVP 2010, very low and low sediments do not require monitoring by a qualified paleontologist. Please revise as follows:

Sediments of ~~very low (PFYC 1), low (PFYC 2), or unknown (PFYC 3b)~~ sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as outlined in the Plan ~~determined by the Qualified Paleontologist~~).

F3-358

F3-359

Comment Set F3: Southern California Edison Company (cont.)

Page D14-20

DEIR/DEIS Text:

PAL-1d

Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting of a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. The monitor will immediately (within 24 hours) report the discovery to the CPUC and BLM. Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance.

SCE Comment:

Edits to the mitigation measure are suggested for consistency for SVP 2010 and the order of discovery of resources. Please revise as follows:

Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. ~~The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present.~~ In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting of a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. ~~The monitor-SCE will immediately (within 24 hours) report the discovery to the CPUC and BLM within 24 hours and/or as outlined in the Plan.~~

Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance. If indicators of potential microvertebrate fossils are found, screening of a test sample shall be carried out as outlined in SVP 2010. This procedure will be outlined in the Plan.

Page D.14-20

DEIR/DEIS Text:

PAL-1d

Removed qualification of monitors from section PAL-1b and add to PAL-1d **Monitor construction for paleontological resources.**

SCE Comment:

SCE suggests adding a new bullet point to PAL-1d to include all potential qualifications from SVP 2010. Please revise as follows:

Paleontological resource monitors per SVP 2010 shall have the equivalent of the following qualifications:

1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or
2. AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or
3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.
4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques

F3-360

F3-361

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.14-21**

**DEIR/DEIS Text:**

PAL-1e Second paragraph:

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all fieldwork is completed.

**SCE Comment:**

Please change the mitigation measure to include time for analyzing remains in the lab prior to prepping them for curation., as follows:

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all ~~fieldwork~~ analyses are completed.

F3-362

**Page D.14-21**

**DEIR/DEIS Text:**

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.

**SCE Comment:**

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

F3-363

**Page D.14-21**

**DEIR/DEIS Text:**

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).

**SCE Comment:**

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).

F3-364

**Page D.14-22**

**DEIR/DEIS Text:**

One impact related to paleontological resources was identified for the Proposed Project.

**SCE Comment:**

Please revise as follows:

~~One impact related to paleontological resources was identified for the Proposed Project.~~ The Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

F3-365

**Page D.14-22**

**DEIR/DEIS Text:**

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.

**SCE Comment:**

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

F3-366



Comment Set F3: Southern California Edison Company (cont.)

Page D.14-22

DEIR/DEIS Text:

*Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class II)*

For the connected actions, construction-related ground disturbance resulting from development of connected action projects in Desert Center and Blythe areas could result in adverse impacts to paleontological resources, including disturbance, damage, or destruction of a significant fossil; destruction of a unique geologic feature associated with a paleontological site; or disturbance or destruction of a paleontological site, which results in the loss of scientific context of fossil remains. Should paleontological resources be discovered during construction-related activities associated with the projects, they would be subject to federal and State legal requirements discussed in Section D.14.2 above and would be required to implement mitigation measures similar to Mitigation Measures PAL-1a through PAL-1e to reduce any adverse impacts to paleontological resources to less than significant levels (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-367

Page D.14-23

DEIR/DEIS Text:

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).

F3-368

Page D.14-23

DEIR/DEIS Text:

One impact related to paleontological resources was identified for the Proposed Project.

SCE Comment:

Please revise as follows:

~~One impact related to paleontological resources was identified for the Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.~~

F3-369

Page D.14-23

DEIR/DEIS Text:

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

F3-370

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.14-23**

**DEIR/DEIS Text:**

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).

**SCE Comment:**

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~could destroy or disturb significant paleontological resources (Class III).

**F3-371**

**Page D.14-24**

**DEIR/DEIS Text:**

One impact related to paleontological resources was identified for the Proposed Project.

**SCE Comment:**

The analysis should state what the impact is. Please revise as follows:

~~One impact related to paleontological resources was identified for the Proposed Project.~~ The Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

**F3-372**

**Page D.14-24**

**DEIR/DEIS Text:**

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.

**SCE Comment:**

Impact PAL-1: The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~could destroy or disturb significant paleontological resources. Construction of the project would destroy or disturb significant paleontological resources.

**F3-373**

**Page D.14-24**

**DEIR/DEIS Text:**

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).

**SCE Comment:**

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~could destroy or disturb significant paleontological resources (Class III).

**F3-374**



**Comment Set F3: Southern California Edison Company (cont.)**

Page D.14-24

DEIR/DEIS Text:

**D.14.4.3 Phased Build Alternative**

***Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources***

**SCE Comment:**

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas could result in additional paleontological impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

F3-375

Page D.14-27

DEIR/DEIS Text:

**PAL-1b: Develop Paleontological Resource Mitigation and Monitoring Plan.** Following completion and approval of the Paleontological Resources Report (required in Mitigation Measure PAL-1a) and prior to the start of ground-disturbing construction, the Applicant shall prepare and submit to CPUC and BLM for review and approval, a Paleontological Resources Mitigation and Monitoring Plan (Plan), consistent with the following requirements:

- The Plan shall be prepared by a Qualified Paleontologist and shall be based on Society of Vertebrate Paleontology (SVP) guidelines and meet all regulatory requirements. The qualified paleontologist shall have a Master's Degree or Ph.D. in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques.
- The Plan shall include a site-specific investigation to identify construction impact areas of moderate (PFYC 3a) to very high (PFYC 5) sensitivity for encountering significant resources and the approximate depths at which those resources are likely to be encountered for each component of each segment of the Proposed Project.
- The Plan shall require the qualified paleontologist monitor to monitor all construction-related ground disturbance in sediments determined to have a moderate (PFYC 3a) to very high (PFYC 5) sensitivity.
- The Plan shall define monitoring procedures and methodology, and shall specify that sediments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. The Qualified Paleontological Monitor shall have at least a B.S. in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material.
- The Plan shall state which resources will be avoided and which shall be recovered for their data potential. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources. The Plan shall also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting.
- The Plan shall specify that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be carried out by qualified, permitted paleontologists with the appropriate current Paleontological Resources Use Permit.

**SCE Comment:**

For the reasons described above, please revise as follows:

**PAL-1b: Develop Paleontological Resource Mitigation and Monitoring Plan.** Following completion and approval of the Paleontological Resources Report (required in Mitigation Measure PAL-1a) and prior to the start of ground-disturbing construction, the Applicant shall prepare and submit to CPUC and BLM for review and approval, a Paleontological Resources Mitigation and Monitoring Plan (Plan), consistent with the following requirements:

§ The Plan shall be prepared by a Qualified Paleontologist and shall be based on Society of Vertebrate Paleontology (SVP) guidelines and meet all regulatory requirements. The qualified paleontologist shall have a Master's Degree or Ph.D. in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques.

F3-376

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

§ The Plan shall include a site-specific investigation to identify construction impact areas of moderate (PFYC 3a) to very high (PFYC 5) sensitivity for encountering significant resources and the approximate depths at which those resources are likely to be encountered for each component of each segment of the Proposed Project.

§ The Plan shall require the qualified paleontological monitor to monitor all construction-related ground disturbance in sediments determined to have a moderate (PFYC 3a) to very high (PFYC 5) sensitivity.

The Plan shall define monitoring procedures and methodology, and shall specify that sediments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. ~~The Qualified Paleontological Monitor shall have at least a B.S. in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material.~~ § The Plan shall state which resources will be avoided and which shall be recovered for their data potential. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources. The Plan shall also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting.

§ The Plan shall specify that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be carried out by qualified, permitted paleontologists with the appropriate current Paleontological Resources Use Permit.

**F3-376  
cont.**

Comment Set F3: Southern California Edison Company (cont.)

Page D.14-28

DEIR/DEIS Text:

F3-377

**PAL-1c: Train construction personnel.** Prior to the initiation of construction, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. The Applicant shall complete training for all construction personnel. Training shall inform all construction personnel of the procedures to be followed upon the discovery of paleontological materials. Training shall inform all construction personnel that Environmentally Sensitive Areas (ESAs) include areas determined to be paleontologically sensitive as defined on the paleontological sensitivity maps for the project, and must be avoided and that travel and construction activity must be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of protected fossils on or off the right-of-way by the Applicant, his representatives, or employees will not be allowed. Violators will be subject to prosecution under the appropriate State and federal laws and violations will be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order. The following issues shall be addressed in training or in preparation for construction:

- All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.
- The Applicant shall provide a background briefing for supervisory personnel describing the potential for exposing paleontological resources, the location of any potential ESAs, and procedures and notifications required in the event of discoveries by project personnel or paleontological monitors. Supervisory personnel shall enforce restrictions on collection or disturbance of fossils.
- Upon discovery of paleontological resources by paleontologists or construction personnel, work in the immediate area of the find shall be halted and the Applicant's paleontologist notified. Once the find has been inspected and a preliminary assessment made, the Applicant's paleontologist will notify the BLM and CPUC and proceed with data recovery in accordance with the approved Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Resource Mitigation and Monitoring Plan).

SCE Comment:

For the reasons described above, please revise as follows:

**PAL-1c: Train construction personnel.** Prior to the initiation of construction, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. The Applicant shall complete training for all construction personnel. Training shall inform all construction personnel that designated Environmentally Sensitive Areas (ESAs) include areas determined to be paleontologically sensitive as defined on the paleontological sensitivity maps for the project, and must be avoided and that travel and construction activity must be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of protected fossils on or off the right-of-way by the Applicant, his representatives, or employees will not be allowed. Violators will be subject to prosecution under the appropriate State and federal laws and violations will be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order. The following issues shall be addressed in training or in preparation for construction:

§ All construction contracts shall include clauses that require construction personnel to attend environmental training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their role in responsibility to avoiding and protect all such paleontological resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.

§ The Applicant shall provide a background briefing for supervisory personnel describing the potential for exposing paleontological resources, the location of any potential ESAs, and procedures and notifications required in the event of discoveries by project personnel or paleontological monitors. Supervisory personnel shall enforce restrictions on collection or disturbance of fossils.

§ Upon discovery of paleontological resources by paleontologists or construction personnel, work in the immediate area of the find shall be halted and the Applicant's paleontologist notified. Once the find has been inspected and a preliminary assessment made, the Applicant's paleontologist will notify the BLM and CPUC and proceed with data recovery in accordance with the approved Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Resource Mitigation and Monitoring Plan).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.14-29

DEIR/DEIS Text:

F3-378

**PAL-1e: Final reporting and curation.** At the conclusion of laboratory work and museum curation, a final report will be prepared describing the results of the paleontological monitoring efforts associated with the project. The report will include a summary of the field and laboratory methods, an overview of the Proposed Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository.

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all fieldwork is completed. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Applicant.

SCE Comment:

For the reasons described above, please revise as follows:

**PAL-1e: Final reporting and curation.** At the conclusion of laboratory work and museum curation, a final report will be prepared describing the results of the paleontological monitoring efforts associated with the project. The report will include a summary of the field and laboratory methods, an overview of the Proposed Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository.

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all fieldwork analyses is completed. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Applicant.

Page D.14-29

DEIR/DEIS Text:

F3-379

**PAL-1d: Monitor construction for paleontological resources.** Based on the paleontological sensitivity assessment and Paleontological Resource Mitigation and Monitoring Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Mitigation and Monitoring Plan), the Applicant shall conduct full-time construction monitoring through its qualified paleontological monitor in areas determined to have moderate (PFYC 3a) to very high (PFYC 5) sensitivity. Sediments of very low (PFYC 1), low (PFYC 2), or unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as determined by the Qualified Paleontologist). Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. The monitor will immediately (within 24 hours) report the discovery to the CPUC and BLM. Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance.

**Comment Set F3: Southern California Edison Company (cont.)**

**SCE Comment:**

For the reasons described above and consistent with SVP 2010, please revise as follows:

PAL-1d: Monitor construction for paleontological resources. Based on the paleontological sensitivity assessment and Paleontological Resource Mitigation and Monitoring Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Mitigation and Monitoring Plan), the Applicant shall conduct full-time construction monitoring through its qualified paleontological monitor in areas determined to have moderate (PFYC 3a) to very high (PFYC 5) sensitivity. Sediments of ~~very low (PFYC 1), low (PFYC 2), or unknown (PFYC 3b)~~ sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as outlined in the Plan ~~determined by the Qualified Paleontologist~~). Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. ~~The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present.~~ In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area (ESA)) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. ~~The monitor SCE will immediately (within 24 hours) report the discovery to the CPUC and BLM within 24 hours and/or as outlined in the Plan.~~ Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance. If indicators of potential microvertebrate fossils are found, screening of a test sample shall be carried out as outlined in SVP 2010. This procedure will be outlined in the Plan. Paleontological resource monitors per SVP 2010 shall have the equivalent of the following qualifications: 1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or 2. AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or 3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project. 4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

**F3-379  
cont.**



### Responses to Comment Set F3 – Section D.14 Paleontological Resources

- F3-351 For Section D.14.1.1 (Paleontological Resources, Regional Setting and Approach to Data Collection), the commenter prefers the phrase “Paleontological Resources, or fossils are the evidence of once-living organisms preserved in the ~~rock~~ geologic record.” We agree that the commenter’s suggestion provides clarity and we have modified Section D.14.1.1 to include the suggested revision.
- F3-352 The commenter is concerned that in Section D.14.3 (Paleontological Resources, Environmental Impacts of the Proposed Project) it is incorrectly assumed that the Proposed Project will have unanticipated discoveries and that resource cannot not be avoided. We agree and have revised the text in Section D.14.3 for clarification, indicating that resources “could” be affected, rather than “would” be affected.
- F3-353 The commenter notes that by using the following language under Impact PAL-1 in Section D.14.3.3 (Impacts and Mitigation Measures), the Draft EIR/EIS incorrectly assumes that the Proposed Project will certainly destroy or disturb significant paleontological resources: Construction of the project would destroy or disturb significant paleontological resource. We agree that Project-related impacts to paleontological resources are potential, not certain. Impact analyses in environmental documents discuss environmental impacts that could happen, but may not necessarily occur as the result of a project. Therefore, they are uncertain by nature. Regardless, Impact PAL-1 in Section D.14.3.3 (Impacts and Mitigation Measures) has been revised to change “would” to “could” to reflect the fact that the project could potentially impact paleontological resources. This same minor change has been made to Impact PAL-1 throughout Section D.14 (Paleontological Resources), as requested.
- F3-354 Under Impact PAL-1 in Section D.14.3.3 (Impacts and Mitigation Measures), the commenter prefers the more precise phrase: “Construction within these segments has the potential to destroy valuable or disturb significant paleontological resources, and mitigation is required.” The commenter’s suggestion helps to clarify Impact PAL-1; therefore, the text in Section D.14.3.3 has been modified to include the suggested revision.
- F3-355 This comment is similar to Comment F-354. See Response to Comment F3-353.
- F3-356 The Commenter suggests Mitigation Measures PAL 1b (Develop Paleontological Resources Mitigation and Monitoring Plan) and PAL-1d (Monitor construction for paleontological resources) be revised to include requirements for Paleontological Monitor qualifications, in accordance with SVP (2010). Text in Mitigation Measures PAL-1b and PAL-1d has been modified, deleting the qualifications statement in Mitigation Measure PAL-1b and inserting the Paleontological Monitor qualifications into Mitigation Measure PAL-1d.
- F3-357 The commenter is concerned that Mitigation Measure PAL-1c (Train construction personnel) does not clearly describe Environmentally Sensitive Areas (ESAs) as they relate to Paleontological Resources. Mitigation Measure PAL-1c has been modified to clarify the ESAs with respect to Paleontological Resources.
- F3-358 The commenter is concerned that language regarding construction contracts in Mitigation Measure PAL-1c (Train construction personnel) is redundant or is already addressed by the Applicant’s BMPs or APMs. We agree and have eliminated the redundant text in Mitigation Measure PAL-1c in Section D.14.3.3 (Impacts and Mitigation Measures).

- F3-359 The commenter is concerned that there is no justification for part-time monitoring or spot-checking in geologic units with very low to low paleontological sensitivity (PFYC Class 1-2), as required in Mitigation Measure PAL-1d (Monitor construction for paleontological resources) in Section D.14.3.3 (Impacts and Mitigation Measures). We agree and Mitigation Measure PAL-1d has been revised to clarify the monitoring requirements for the Proposed Project.
- F3-360 The Commenter suggests revising the Mitigation Measure PAL-1d (Monitor construction for paleontological resources) for clarity. Mitigation Measure PAL-1d text has been revised to explicitly specify the SVP (2010) guidelines in order to ensure consistency, including those related to the screening of potential microvertebrate fossil test samples and paleontological resource monitor's qualifications. As with the Draft EIR/EIS, these procedures would all be outlined in the Paleontological Resource Mitigation and Monitoring Plan, which is required under Mitigation Measure PAL-1b (Develop Paleontological Mitigation and Monitoring Plan).
- F3-361 This comment is similar to Comment F3-356. See Response to Comment F3-356. The suggested revisions have been made.
- F3-362 The commenter suggests revising the Mitigation Measure PAL-1e (Final reporting and curation) in Section D.14.3.3 (Impacts and Mitigation Measures) to allow more time for specimen analyses following fieldwork. We agree and have revised the text in Mitigation Measure PAL-1e accordingly.
- F3-363 See Response to Comment F3-353. Impact PAL-1 in Section D.14.3.4 (Impacts of Connected Actions) was revised to reflect potential impacts.
- F3-364 See Response to Comment F3-353. Impact PAL-1 in Draft EIR/EIS Section D.14.3.5 (CEQA Significance Determination for Proposed Project and Connected Actions) was revised in CPUC's Final EIR to reflect that impacts are potential, not certain. This relates to CEQA, not NEPA.
- F3-365 The commenter suggests revising Section D.14.4.1 (Tower Relocation Alternative) for clarity to describe what the impact related to loss of paleontological resources would be. The second paragraph in Section D.14.4.1 has been revised to further clarify the potential impacts of the alternatives.
- F3-366 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.1 (Tower Relocation Alternative) was revised to reflect that impacts are potential, not certain.
- F3-367 See Response to Comment F3-102.
- F3-368 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.1 (Tower Relocation Alternative) has been revised to reflect potential impacts by changing "would" to "could" in the Final EIS.
- F3-369 The commenter suggests revising Section D.14.4.2 (Iowa Street 66 kV Underground Alternative) for clarity to describe what the impact related to loss of paleontological resources would be. The second paragraph in Section D.14.4.2 has been revised as suggested in order to further clarify the potential impacts of the alternatives.
- F3-370 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.2 (Iowa Street 66 kV Underground Alternative) was revised to reflect potential impacts, indicating that resources "could" be affected, rather than "would" be affected.

- F3-371 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.3 was revised to reflect potential impacts by changing “would” to “could” in the Final EIS.
- F3-372 The commenter suggests revising Section D.14.4.3 (Phased Build Alternative) for clarity. The second paragraph in Section D.14.4.3 has been revised in order to further clarify the potential impacts of the alternatives by changing “would” to “could” in the Final EIS.
- F3-373 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.3 (Phased Build Alternative) was revised to reflect potential impacts by changing “would” to “could” in the Final EIS.
- F3-374 See Responses to Comments F3-353 and F3-364. Impact PAL-1 in Section D.14.4.3 (Impacts and Mitigation Measures) was revised to reflect potential impacts by changing “would” to “could” in the Final EIS.
- F3-375 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-376 See Response to Comment F3-356.
- F3-377 See Response to Comments F3-357 and F3-358.
- F3-378 See Response to Comment F3-362.
- F3-379 See Response to Comments F3-359 and F3-360.



## Comment Set F3: Southern California Edison Company (cont.)

### Section D.15 Recreation

#### Page D.15-15

##### DEIR/DEIS Text:

Coordinate construction schedule and activities with the authorized officer for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the authorized officer of the recreation areas listed below. SCE shall schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with, and at the discretion of the authorized officer. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations of the authorized officer. SCE shall also prepare a public notice of construction activities consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with the authorized officer, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

##### SCE Comment:

To ensure that mitigation measure R-1a can successfully be implemented, please make the following revision:

**R-1a: Coordinate construction schedule and activities with the authorized officer a representative for the recreation area.** No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the authorized officer a representative of the recreation areas listed below. SCE shall use best efforts to schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with, and at the discretion of the authorized officer the representative. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations of the authorized officer a representative. SCE shall also prepare a public notice of construction activities consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with a representative the authorized officer, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

#### Page D.15-15

##### DEIR/DEIS Text:

Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

##### SCE Comment:

To ensure that mitigation measure R-1b can successfully be implemented, please make the following revision:

**R-1b: Coordinate with local agencies to identify alternative recreation areas.** SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and as allowed by the facility representative and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

F3-380

F3-381

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.15-16**

**DEIR/DEIS Text:**

***Impact R-2: Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value***

The proposed double-circuit structures would be greater in height than the single-circuit structures, and as such the Proposed Project would alter the viewshed along the ROW (see Section D.18.3, Visual Resources). However, the number of transmission lines that would traverse the recreational areas would decrease, allowing additional space for recreation.

**SCE Comment:**

To accurately characterize the change in viewshed, please make the following edits:

The proposed double-circuit structures would be greater in height than the single-circuit structures and would reduce the overall number of structures from three to two, and as such the Proposed Project would alter the viewshed along the ROW (see Section D.18.3, Visual Resources). ~~However,~~ The number of transmission lines that would traverse the recreational areas would decrease, allowing additional space for recreation.

F3-382

**Page D.15-16**

**DEIR/DEIS Text:**

Recreational resources that are located in the vicinity of the ROW would potentially be affected by the siting of a new transmission line.

**SCE Comment:**

To accurately characterize the change in viewshed, please make the following edits:

Recreational resources that are located in the vicinity of the ROW would potentially be affected by the removal of an existing transmission line and siting of a new transmission line.

F3-383

**Page D.15-18**

**DEIR/DEIS Text:**

***Impact R-1: Construction activities would temporarily reduce access and visitation to recreation areas (Class II)***

For the connected actions, temporary conflicts regarding access to recreation areas during construction of the solar projects would depend on the final location of these projects relative to recreation areas. A short-term interference with visitation to a recreation site would create a potentially significant impact. Indirect impacts to recreation areas would also occur from construction-related noise, dust, and traffic that would diminish the value of nearby recreational facilities and would contribute to a decline in visitation. Imposing measures similar to Mitigation Measures R-1a and R-1b would reduce the impact to a less than significant level by ensuring that the construction time frame avoids the heavy recreational use periods and by identifying alternative areas for recreation to provide the users recreational options throughout the entire construction period (Class II).

**SCE Comment:**

The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-384

## Comment Set F3: Southern California Edison Company (cont.)

### Page D.15-19

#### DEIR/DEIS Text:

**Impact R-2: Presence of project facilities would change the character of a recreation area, diminishing its recreational value (Class I for Connected Actions)**

**Connected Actions.** The solar generation projects that are connected to the WOD Project would introduce energy infrastructure into a natural and undeveloped landscape that is characterized by its scenic resources. These projects would be visible from many recreation areas, especially in the Desert Center Area and the Blythe Area where many ACECs and wilderness areas are located. In particular, the CEC concluded that the impacts on local residents, the Desert Center Airport, and recreational visitors to the Chuckwalla Valley Raceway from the effects of glint and glare would be significant. The environmental review of the Solar Harvest project concluded that construction of the project would alter the existing character of the area and may affect surrounding recreational uses as a result of the altered viewshed, including a substantial adverse effect on the wilderness experience of dispersed and occasional visitors to the Joshua Tree Wilderness Area. It is likely that glint and glare for other solar PV projects would also be significant. Implementing mitigation measures similar to those imposed on the Proposed Project for visual resources would reduce impacts to the recreational experience of these resources to the extent feasible. However, the long-term impacts to the recreational value of these resources would remain significant and unavoidable (Class I).

#### SCE Comment:

The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-385

### Page D.15-19

#### DEIR/DEIS Text:

**Impact R-3: Presence of project facilities would permanently preclude recreational activities (Class II for Connected Actions)**

**Connected Actions.** The connected projects are not anticipated to limit or preclude access to regional, city, or private recreation areas. Unlike these recreation opportunities, most BLM-managed recreational opportunities are dispersed across the desert areas. Construction of solar generation projects on BLM lands would eliminate access to these affected lands for the life of the project and could alter access to other areas. Mitigation measures would be needed to require alternate access to areas made inaccessible; such measures would make the impact less than significant (Class II).

#### SCE Comment:

The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-386

### Page D.15-22 through 23

#### DEIR/DEIS Text:

##### D.15.4.3 Phased Build Alternative

**Impact R-1: Construction activities would temporarily reduce access and visitation to recreation areas**

**Impact R-2: Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value**

**Impact R-3: Presence of a transmission line would permanently preclude recreational activities**

#### SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional recreation impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

F3-387

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.15-25

DEIR/DEIS Text:

Table D.15-3. Mitigation Monitoring Program – Recreation

MITIGATION MEASURE

R-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the authorized officer of the recreation areas listed below. SCE shall schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with, and at the discretion of the authorized officer. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations of the authorized officer. SCE shall also prepare a public notice of construction activities consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with the authorized officer, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

- Rancho Mediterranean Park
- South Hills Preserve
- Lillian V. Miller Memorial Trail
- Rest areas
- Stetson Community Park
- Noble Creek Regional Park
- Trevino Community Park
- Bike lane on Barton Road, Beaumont Avenue, Drainage and SCE Corridor Class I path, Cherry Avenue
- Norton Younglove Preserve
- San Timoteo Canyon State Park
- Cherry Valley Lakes RV campground
- Oak Valley Golf Club and Park
- Pacific Crest Trail

SCE Comment:

To ensure that mitigation measure R-1a can successfully be implemented, please make the following revision:

Table D.15-3. Mitigation Monitoring Program – Recreation

MITIGATION MEASURE

R-1a: Coordinate construction schedule and activities with ~~the authorized officer~~ a representative for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the ~~authorized officer~~ a representative of the recreation areas listed below. SCE shall ~~use best efforts to~~ use best efforts to schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with, ~~and at the discretion of the authorized officer~~ and at the discretion of the authorized officer. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations of ~~the authorized officer~~ a representative. SCE shall also prepare a public notice of construction activities consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with ~~a representative of the authorized officer~~ a representative, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

- Rancho Mediterranean Park
- South Hills Preserve
- Lillian V. Miller Memorial Trail
- Rest areas
- Stetson Community Park
- Noble Creek Regional Park
- Trevino Community Park
- Bike lane on Barton Road, Beaumont Avenue, Drainage and SCE Corridor Class I path, Cherry Avenue
- Norton Younglove Preserve
- San Timoteo Canyon State Park
- Cherry Valley Lakes RV campground
- Oak Valley Golf Club and Park
- Pacific Crest Trail

F3-388

Comment Set F3: Southern California Edison Company (cont.)

Page D.15-26

DEIR/DEIS Text:

MITIGATION MEASURE

R-1b: Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

SCE Comment:

To ensure that mitigation measure R-1b can successfully be implemented please make the following revision:

MITIGATION MEASURE

R-1b: Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and as allowed by the facility representative and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

F3-389

Page D.15-13

DEIR/DEIS Text:

D.15.3.2 CEQA Significance Criteria

According to the CEQA Environmental Checklist for assessing the impacts to recreation, a project causes a potentially significant impact if it would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Neither of these is applicable. The Proposed Project is a transmission project with a set construction period and a small operations workforce. It does not include an increase in population that would substantially increase the use of existing neighborhood and regional parks such that a substantial physical deterioration would occur; therefore, the first CEQA Environmental Checklist significance criterion is not applicable. The Proposed Project would not require construction of recreational facilities or require the expansion of recreational facilities; therefore the second criterion is not applicable to this project and is not addressed.

Although not identified in the CEQA checklist, from previous transmission projects it is known that the Proposed Project could result in impacts to recreation that:

- Would directly or indirectly disrupt activities in established recreation areas and reduce access or visitation.
- Would substantially reduce the scenic, biological, cultural, geologic, or other important factors that could be to the value of recreational facilities or areas.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~Although not identified in the CEQA checklist, from previous transmission projects it is known that the Proposed Project could result in impacts to recreation that:~~

- ~~▪ Would directly or indirectly disrupt activities in established recreation areas and reduce access or visitation.~~
- ~~▪ Would substantially reduce the scenic, biological, cultural, geologic, or other important factors that could be to the value of recreational facilities or areas.~~

F3-390



### Responses to Comment Set F3 – Section D.15 Recreation

- F3-380 The commenter requests revisions to Mitigation Measure R1-a (Coordinate construction schedule and activities with the authorized officer for the recreation area) to provide some flexibility for the construction schedule.
- The mitigation measure has been revised in Section D.15.3.3 (Recreation, Impacts and Mitigation Measures) to allow flexibility for the construction schedule. It also has been revised to require SCE to provide to the CPUC and BLM any dates of heavy recreational use that cannot be avoided and an explanation for why they cannot be avoided. It also will require SCE to avoid construction overlapping with an entire season of heavy use. While Mitigation Measure R-1a provides SCE more flexibility for limited work during heavy recreational use, SCE will need to identify alternative recreation areas as required by Mitigation Measure R-1b.
- F3-381 The commenter requests a revision to Mitigation Measure R1-b (Coordinate with local agencies to identify alternative recreation areas) that would clarify that SCE would only post public notices at the recreation facilities as allowed by the facility representatives.
- The mitigation measure has been clarified in Section D.15.3.3 (Recreation, Impacts and Mitigation Measures) to state that the recreational facility representatives will determine where and how public notices would be posted.
- F3-382 The commenter requests adding language that highlights that while the new proposed double-circuit structures would be greater in height than the existing single-circuit structures, the project would decrease the number of structures from three to two.
- This change has not been made. The first sentence of the discussion of Impact R-2 (Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value) in Section D.15.3.3 already notes that the Proposed Project would decrease the number of transmission lines from three lines to two lines. Additionally, the existing structures are not uniform in nature and a viewshed may include many more than three structures so this language would not accurately characterize the change in a viewshed.
- F3-383 The commenter requests adding language that notes that recreational resources would be potentially affected by the removal of an existing transmission line in addition to the siting of a new transmission line to Impact R-3 (Presence of a transmission line would permanently preclude recreational activities).
- This change has been made to the discussion of Impact R-3 in Section D.15.3.3 (Impacts and Mitigation) to better reflect the change caused by the project that would be visible from recreational resources.
- F3-384 See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-385 See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-386 See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-387 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

- F3-388 The commenter requests the same revisions to Mitigation Measure R-1a as Comment F3-380 only in Table D.15-3 (Mitigation Monitoring Program – Recreation). Please see Response to Comment F3-380.
- F3-389 This comment requests the same revisions to Mitigation Measure R-1b as Comment F3-381 only in Table D.15-3 (Mitigation Monitoring Program – Recreation). Please see Response to Comment F3-381.
- F3-390 See Response to Comment F3-95 with regard to the use of significance criteria.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.16 Transportation and Traffic

#### Page D.16-2

##### DEIR/DEIS Text:

###### D.16.1.2 Environmental Setting by Segment

Major regional highways in the project vicinity include Interstate (I) highways and State Routes (SR). These are I-10, I-215, SR-60, SR-62, SR-79, and SR-111. Average daily traffic on various segments of these highways is shown in Table D.16-1. These regional highways would be used by construction workers and materials delivery trucks to reach assembly points, yards, and work sites along the project's length.

##### SCE Comment:

The proposed project also has a telecommunication line that crosses SR-243 near the Banning Substation. Please revise the sentence as follows:

Major regional highways in the project vicinity include Interstate (I) highways and State Routes (SR). These are I-10, I-215, SR-60, SR-62, SR-79, ~~and~~ SR-111, and SR-243.

F3-391

#### Page D.16-13

##### DEIR/DEIS Text:

###### D.16.3.2 CEQA Significance Criteria

The significance criteria for transportation and traffic impacts are based on the CEQA Guidelines Appendix G Checklist and on comments received during scoping of the EIR/EIS. During scoping, concerns were expressed regarding levels of traffic on local roads, truck routes on the different project segments, the need for SCE to coordinate with local agencies on the construction schedule, and the repair of any dam-age to local roads. Several commenters requested that the EIR/EIS consider the impact of road closures and potential limited access to residential streets and individual residences and businesses.

Based on these criteria, transportation or traffic impacts would be significant if:

- Construction would require the temporary closure of lanes or roadways that would significantly: reduce the performance of the circulation system; create disruption of traffic flow; increase traffic congestion; restrict the movements of emergency vehicles; disrupt bus transit service; impede pedestrian and bicycle movement; and/or restrict access to residences and businesses.
- Vehicle movements associated with construction worker trips or movement of materials and equipment would result in an unacceptable reduction in level of service on the roadways in the project area.
- Construction activities would conflict with plants transportation projects in the project area.
- An increase in roadway wear and deterioration would occur as a result of being used by heavy trucks or construction equipment.
- Construction or staging activities would increase the demand for or reduce the supply of parking spaces.
- Helicopter used during construction would pose risks to public safety and create excessive noise and dust.
- Project construction cranes or permanent structures would be at heights so as to create aviation hazards or adversely affect airport or heliport facility use.

##### SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. The following criteria are provided in the CEQA Guidelines Appendix G Checklist:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

F3-392



**Comment Set F3: Southern California Edison Company (cont.)**

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e) Result in inadequate emergency access?
- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

As such, please remove the following:

- Construction would require the temporary closure of lanes or roadways that would significantly reduce the performance of the circulation system; create disruption of traffic flow; increase traffic congestion; restrict the movements of emergency vehicles; disrupt bus transit service; impede pedestrian and bicycle movement; and/or restrict access to residences and businesses.
- Vehicle movements associated with construction worker trips or movement of materials and equipment would result in an unacceptable reduction in level of service on the roadways in the project area.
- Construction activities would conflict with plants transportation projects in the project area.
- An increase in roadway wear and deterioration would occur as a result of being used by heavy trucks or construction equipment.
- Construction or staging activities would increase the demand for or reduce the supply of parking spaces.
- Helicopter used during construction would pose risks to public safety and create excessive noise and dust.
- Project construction cranes or permanent structures would be at heights so as to create aviation hazards or adversely affect airport or heliport facility use.

**F3-392**  
**cont.**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.16-15

DEIR/DEIS Text:

F3-393

***Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties***

**T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent possible. Parking shall not be permitted in areas with dry vegetation that could pose a fire hazard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached, if any.

**SCE Comment:**

The analysis included under heading, *T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties*, does not demonstrate that temporary impacts as a result of construction of the Proposed Project are significant thus requiring mitigation. CEQA Guidelines section, 15126.4 (3) Mitigation measures are not required for effects which are not found to be significant, therefore mitigation measure T-1a should be removed from the DEIR/DEIS.

Additionally, the mitigation measure requires that SCE prepare a Construction Transportation Plan with the intent to reduce construction generated traffic on regional and local roadways, where construction traffic has the potential to "significantly affect regional and local roadways." The document does not demonstrate significance, nor contain any study identifying where construction traffic or when construction traffic would be considered significant, therefore as written, the mitigation measure cannot be successfully implemented as the document does not demonstrate when the mitigation would be required.

The mitigation measure also requires, "...describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways." As explained in the Transportation and Traffic section of SCE's PEA, sufficient information redundant to the requirements of the mitigation measure has been included as part of the analysis prepared for SCE's Proposed Project and is included below for reference:

- Construction workers commuting to the Proposed Project site(s) would use interstates, State highways, and local roadways (p. 4-16.2)
- At the beginning of each day of construction, workers would arrive at the staging areas in personal vehicles and depart the staging area in work vehicles destined for the transmission corridor (p.4-16.18)
- Construction workers would typically arrive at staging yards prior to 7:00 a.m., although it is expected that some workforce traffic may arrive during the a.m. peak commute period. The length of the work day would vary by season based on available sunlight. During winter, construction workers would typically leave prior to 4:00 p.m. During summer, construction workers would typically leave after 6:00 p.m. Therefore, during most of the year, construction worker trips would occur outside of the peak commute periods and there would be no impact on traffic during the morning (a.m.) and evening (p.m.) peak periods (p. 4-16.24)

Based on the reasoning provided above, Mitigation Measure T-1a should be removed.

Comment Set F3: Southern California Edison Company (cont.)

***Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties***

F3-393  
cont.

**T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent possible. Parking shall not be permitted in areas with dry vegetation that could pose a fire hazard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached, if any.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.16-15

DEIR/DEIS Text:

Mitigation Measure for Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area

T-4a Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached.

At the end of major construction, SCE shall coordinate with each affected jurisdiction to confirm what repairs would be required. Any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation when the coordination has been completed and when the repairs have been completed.

SCE Comment:

The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination, as compared to the benefit of said coordination. SCE recommends the following revision:

**MITIGATION MEASURE — MM T-4a: Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, SCE shall coordinate repairs with the affected public agencies and ensure that any such damage is repaired to the pre-construction condition within 60 days from the end of all construction within each affected county.**

~~T-4a Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images upon request.~~

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached.

~~At the end of major construction, SCE shall coordinate with each affected jurisdiction to confirm what repairs would be required. Any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation when the coordination has been completed and when the repairs have been completed.~~

F3-394

Comment Set F3: Southern California Edison Company (cont.)

Page D.16-20

DEIR/DEIS Text:

**T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way.** SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fe Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM at least 60 days prior to construction in or across rail ROWs.

SCE Comment:

The lead time as written is overly burdensome and submittal of copies of permits or approvals may not be available that far in advance of work needing to occur. Please make the following edits:

**T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way.** SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fe Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM ~~at least 60 days prior to construction in or across rail ROWs.~~

F3-395

Page D.16-24

DEIR/DEIS Text:

**Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties (Class II)**

Although connected solar projects are in rural or remote locations, their construction could require brief road or land closures during certain construction activities. Depending on the site location, project construction could briefly affect access to adjacent properties. Implementation of typical mitigation, such as a construction transportation plan, would ensure that this impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-396

Page D.16-24

DEIR/DEIS Text:

**Impact T-2: Traffic related to project construction and operation would result in unacceptable levels of service on roadways in the project area (Class II)**

With regard to connected actions, the location of solar projects in areas with generally light traffic is not expected to result in unacceptable levels of service on roadways in the vicinity of the projects. However, implementation of a construction transportation plan, including adoption of carpooling and time-of-day arrival and departure of workers, would ensure that any level of service impacts are addressed. This would result in a less than significant impact with mitigation (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-397

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.16-24**

**DEIR/DEIS Text:**

***Impact T-3: Construction would conflict with planned transportation projects (Class II)***

While conflicts between connected solar projects and planned transportation projects are unlikely, implementation of a requirement that project proponents coordinate with regional transportation management agencies would ensure that this impact is less than significant (Class II).

**SCE Comment:**

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

**F3-398**

**Page D.16-25**

**DEIR/DEIS Text:**

***Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area (Class II)***

As with the Proposed Project, heavy trucks and equipment can cause damage to roads leading to solar project sites. Implementation of a measure to require documentation of road conditions and appropriate repair or payment for damage would ensure that this impact is less than significant (Class II).

**SCE Comment:**

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

**F3-399**

**Pages D.16-34 through 37**

**DEIR/DEIS Text:**

**D.16.4.3 Phased Build Alternative**

***Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties***

***Impact T-2: Traffic related to project construction and operation would result in unacceptable levels of service on roadways in the project area***

***Impact T-3: Construction would conflict with planned transportation projects***

***Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area***

***Impact T-5: Construction activities would cause a temporary disruption to rail traffic or operations***

***Impact T-6: Construction would result in the short-term elimination of parking spaces***

***Impact T-7: Use of helicopters would have potential impacts on public safety and create nuisance conditions***

***Impact T-8: Operations would affect aviation safety and activities associated with public airports***

**SCE Comment:**

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional transportation and traffic impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

**F3-400**



Comment Set F3: Southern California Edison Company (cont.)

Page D.16-39

DEIR/DEIS Text:

*Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties*

**T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent possible. Parking shall not be permitted in areas with dry vegetation that could pose a fire hazard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached, if any.

SCE Comment:

Consistent with the rationale provided in the comments above, the following mitigation measure should be removed:

**T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent possible. Parking shall not be permitted in areas with dry vegetation that could pose a fire hazard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached, if any.

F3-401

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.16-42

DEIR/DEIS Text:

**T-4a: Repair roadways damaged by construction activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached.

At the end of major construction, SCE shall coordinate with each affected jurisdiction to confirm what repairs are required. Any damage is to be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation when the coordination has been completed and when the repairs have been completed.

SCE Comment:

The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination as compared to the benefit of said coordination. SCE recommends the following revision:

**MITIGATION MEASURE — MM T-4a: Repair roadways damaged by construction activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, SCE shall coordinate repairs with the affected public agencies and ensure that any such damage is repaired to the pre-construction condition within 60 days from the end of all construction within each affected county.

**T-4a: Repair roadways damaged by construction activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached.

At the end of major construction, SCE shall coordinate with each affected jurisdiction to confirm what repairs would be required. Any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation when the coordination has been completed and when the repairs have been completed.

F3-402



**Comment Set F3: Southern California Edison Company (cont.)**

Page D.16-42

**DEIR/DEIS Text:**

**T-5a: Obtain required permits or approvals for crossing or working in railroad rights-of-way.** SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fe Railway) to ensure project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM at least 60 days prior to construction in or across rail ROWs.

**SCE Comment:**

The lead time as written is overly burdensome and submittal of copies of permits or approvals may not be available that far in advance of work needing to occur. Please make the following edits:

**T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way.** SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fe Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM ~~at least 60 days prior to construction in or across rail ROWs.~~

F3-403

### Responses to Comment Set F3 – Section D.16 Transportation and Traffic

- F3-391 The commenter suggests adding State Route 243 to the list of major regional highways included in the first sentence of Section D.16.1.2 (Transportation and Traffic, Environmental Setting by Segment). State Route 243 was incorporated in the Draft EIR/EIS analysis, but was left off of this list in error. Therefore, this addition has been made in the Final EIS.
- F3-392 The commenter requests removal of numerous significance criteria related to Transportation and Traffic. Please see Response to Comment F3-95.
- F3-393 The commenter requests deletion of Mitigation Measure T-1a (Prepare Construction Transportation Plan), which addresses Impact T-1 (Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties). The commenter asserts that the analysis of the impact does not demonstrate that temporary impacts as a result of construction are significant and require mitigation, citing CEQA Guidelines section 15126.4(3). The commenter further asserts that the Draft EIR/EIS does not identify when or where construction traffic would be considered significant. The commenter cites information provided in the Proponent's Environmental Assessment (PEA) and identifies that it is sufficient to address the requirements of the mitigation measure.

Except for one Applicant's Proposed Mitigation (APM) related to helicopter use, the PEA does not provide any APMs specific to transportation and traffic. The commenter cites various places in the PEA in which it is stated that workers would use various highways and roadways; that they would assemble at staging areas in personal vehicles and depart to construction sites in work vehicles; and that they would typically arrive at staging yards prior to 7:00 a.m. and leave before or after peak commute periods, depending on the season. These statements are not binding. Mitigation Measure T-1a establishes a requirement that a Construction Transportation Plan, incorporating these strategies, be developed and approved. This would make clear that the statements in the PEA are binding on the project. Mitigation Measure T-1a also addresses the requirement to park within the project ROW or other approved areas at project sites and not park in areas of dry vegetation, which would pose a fire hazard.

In the absence of knowing when and how many vehicles would be arriving and departing various yards and construction sites, it was conservatively assumed that construction-related traffic could create a significant impact. Taking at face value the information provided in the PEA, Mitigation Measure T-1a was established to ensure compliance with the strategies enumerated in the PEA to reduce traffic impacts. No change in Mitigation Measure TR-1a is required as a result of this comment; however, the requirement to describe alternate traffic routes is deleted.

- F3-394 The commenter requests Mitigation Measure T-4a (Repair roadways damaged by construction activities) be revised to eliminate the requirement that SCE photograph or video record pre-construction conditions of roads at specified locations. SCE requests that coordination of repairs with the affected public agencies be the requirement, omitting how conditions would be documented.

Mitigation Measure T-4a was revised somewhat in response to one jurisdiction's comments. See Responses to Comments A1-7 and A1-8. The revisions allow for an alternative method

for determining pre-construction roadway conditions and also extend the pre-construction documentation to include areas of trenching or digging in roadways. The revision requested by SCE would delete the requirement for pre-construction documentation, requiring only coordination with affected public agencies on repairs. This suggested revision would leave open how pre-construction conditions are documented so as to ensure appropriate post-construction repair. In the absence of documentation, there would be no way for the parties to assess what is project-related damage and what is a pre-existing condition. Therefore, no change in the mitigation measure is required as a result of this comment. The last sentence of the mitigation measure is edited for clarity.

- F3-395 The commenter suggests omitting the requirement that copies of permits for work in railroad ROW be provided at least 60 days in advance, because permits or approvals may not be available that far in advance of work needing to occur. The 60-day requirement has been removed in Mitigation Measure T-5a (Obtain required permits or approvals for crossing or working in railroad rights-of-way). Instead copies of the permits/approvals will need to be received prior to construction in or across rail ROWs. Because the BLM will only be receiving copies and no review/approval is required, the 60-day timeframe is not necessary and its removal in the Final EIS does not affect the adequacy of the mitigation measure.
- F3-396 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. Clarification has been added in Section D.1.5 (Analysis of Connected Actions).
- F3-397 This comment is similar to Comment F3-396. Please see Response to Comment F3-396.
- F3-398 This comment is similar to Comment F3-396. Please see Response to Comment F3-396.
- F3-399 This comment is similar to Comment F3-396. Please see Response to Comment F3-396.
- F3-400 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-401 This comment is similar to Comment F3-393. Please see Response to Comment F3-393.
- F3-402 This comment is similar to Comment F3-394. Please see Response to Comment F3-394.
- F3-403 This comment is similar to Comment F3-395. Please see Response to Comment F3-395.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.17 Utilities and Public Services

#### Page D.17-9

##### DEIR/DEIS Text:

Jurisdictions within this segment include unincorporated Riverside County and the Cities of Calimesa, Beaumont, and Banning. The City of Yucaipa is included in this segment as the Tennessee Substation is located here. Unincorporated River-side County is described in Section D.17.1.2.3, Segment 3: San Timoteo Canyon. Any new information for the County is provided below.

##### SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Jurisdictions within this segment include unincorporated Riverside County and the Cities of Calimesa, Beaumont, and Banning. ~~The City of Yucaipa is included in this segment as the Tennessee Substation is located here.~~ Unincorporated River-side County is described in Section D.17.1.2.3, Segment 3: San Timoteo Canyon. Any new information for the County is provided below.

F3-404

#### Page D.17-24

##### DEIR/DEIS Text:

In addition to the CEQA Environmental Checklist significance criteria, the following criterion was used to assess impacts to utilities because the construction would cross a large number of existing electrical or other utility systems:

- Disrupt the existing utility system or cause a collocation accident

##### SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~In addition to the CEQA Environmental Checklist significance criteria, the following criterion was used to assess impacts to utilities because the construction would cross a large number of existing electrical or other utility systems:~~

- ~~Disrupt the existing utility system or cause a collocation accident~~

F3-405

#### Pages D.17-26 through 27

##### DEIR/DEIS Text:

UPS-1a Use non-potable water for construction purposes. Use non-potable water for construction purposes. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from nonpotable sources, if available, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.

##### SCE Comment:

The environmental analysis does not provide evidence that the temporary use of water for construction of the Proposed Project would result in a significant impact that would require mitigation. H, however, for consistency with the paraphrasing of the mitigation measure UPS-1a, , "would require SCE to use non-potable water for dust control and soil compaction whenever feasible", please make the following revision:

UPS-1a Use non-potable water for construction purposes. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources as feasible, if available, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a mini-mum of 60 days prior to the start of construction.

F3-406

Comment Set F3: Southern California Edison Company (cont.)

Page D.17-32

DEIR/DEIS Text:

**Impact UPS-1: Project construction and operation would increase the need for public services and utilities (Class II for Proposed Project; Class II or III for Connected Actions)**

With regard to the connected actions, except for fire services, construction and operation of the solar projects would have less than significant impacts (Class III) on utilities and public services. For fire services, the operational capabilities to handle technical rescues at electrical facilities, such as confined space/trench rescue/high angle rescue, may require additional staffing, training, and equipment. New or upgraded fire facilities may be required to accommodate additional staffing and fire rescue apparatus for solar facilities. Specialized rescue equipment also may be required in order to service the proposed gen-tie lines, which will require proper storage and maintenance to ensure optimal performance in the event of an emergency. The need for additional staff, equipment, or construction of fire response facilities would be a significant indirect environmental impact resulting from the implementation of the solar projects, particularly in the Desert Center and Blythe areas. The Palen Solar Power Project has included funding to help the RCFD with equipment and response times. In addition, it was concluded that compliance with all federal, State, and local safety requirements and providing mitigation to the RCFD (in the form of funding) would be adequate to assure protection from all fire hazards, and that new and expanded facilities are not needed.

If fire/rescue facilities are constructed or acquired using funds provided by solar projects, the construction of such facilities would be a significant indirect environmental impact resulting from the implementation of these solar projects. Typically, solar energy facilities prepare and implement a Fire Management and Protection Plan to ensure that emergency fire precautions are employed during project construction. Compliance with Riverside County Ordinance 659 and the resultant impact fees for fire services would help ensure that adequate new or expanded facilities are in place for projects in the affected areas. Together, the compliance with Riverside County Ordinance 659 and payment of impact fees similar to mitigation from the Palen Solar Power Project would reduce this impact to less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.17-33

DEIR/DEIS Text:

**UPS-2: Construction would disrupt existing pipelines and utility systems or cause a collocation accident (Class II).**

Similar impacts would occur for connected actions when located in the vicinity of pipelines and utilities, and similar mitigation would be required (Class II)

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-407

F3-408

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.17-39

**DEIR/DEIS Text:**

**UPS-1a:** Use non-potable water for construction purposes. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources, if available, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.

**SCE Comment:**

The environmental analysis does not provide evidence that the temporary use of water for construction of the Proposed Project would result in a significant impact that would require mitigation. H, however, for consistency with the paraphrasing of the mitigation measure UPS-1a, , "would require SCE to use non-potable water for dust control and soil compaction whenever feasible", please make the following revision:

**UPS-1a** Use non-potable water for construction purposes. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources ~~as feasible, if available, and ensured in a water contract through a local water agency or district.~~ The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a mini-mum of 60 days prior to the start of construction.

F3-409



## Responses to Comment Set F3 – Section D.17 Utilities and Public Services

- F3-404 The commenter notes that due to additional engineering, the work for the Timoteo and Tennessee Substations is no longer needed for the Proposed Project and request section D.17.1.2.4 (Utilities and Public Services, Segment 4: Beaumont and Banning) be revised to eliminate reference to the Tennessee Substation.
- Section D.17.1.2.4 has been revised as requested. Additionally, as a result of the revision the only part of the Proposed Project located in the City of Yucaipa has been eliminated and all associated references to Yucaipa have been stricken as appropriate. The overall significance conclusions for impacts in the Draft EIR/EIS would not be affected.
- F3-405 See Response to Comment F3-95 with regard to the use of significance criteria.
- F3-406 The commenter reiterates what Section D.17.3.5 (Utilities and Public Services, CEQA Significance Determination for Proposed Project and Connected Actions) states, that impacts to the regional water supply would not be significant but that Mitigation Measure UPS-1a (Use non-potable water) would further reduce the effect. Additionally, the commenter requests a revision to the language of UPS-1a to match the discussion under Impact UPS-1 (Project construction and operation would increase the need for public services and utilities) that states the mitigation measure would be implemented as feasible.
- Significance determination is a CEQA requirement, not a NEPA requirement. Mitigation Measure UPS-1a has been revised to clarify the feasibility of the measure; however, SCE has not explained why it remainder of the sentence that does not address feasibility was recommended to be stricken so this revision was not made.
- F3-407 See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-408 See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-409 The commenter requests the same revisions to Mitigation Measure UPS-1a as Comment F3-406 only in Table D.17-8 (Mitigation Monitoring Program – Utilities and Public Services). Please see Response to Comment F3-406.

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Section D.18 Visual Resources

#### Figures D.18-1 through D.18-6

##### DEIR/DEIS Text:

##### General Comment identifying issues associated with CPUC Preferred Alternative

Figures D.18-1 through D.18-6 comprise a set of maps that are all on the same base – i.e. they all show the entire route and label the individual line segments. The six maps differ from one another only in that each of the maps presents the results of GIS visibility analyses run for each of the individual line segments.

##### SCE Comment:

The map set referenced does not provide enough information to track the analysis and assess the relevance and accuracy of the findings. This is particularly true for those findings related to the impacts of the alternatives, for which no simulations have been provided.

F3-410

#### Figures D-18-8A through D.18-25B

##### DEIR/DEIS Text:

##### General Comment identifying issues associated with CPUC Preferred Alternative

The key observation point (KOP) figures present an existing photo of each view and simulations for each view of what the view would look like with the project in place. In two cases, simulations are also provided that depict how the views would appear should the FAA require marker balls.

##### SCE Comment:

There are no simulations that depict the appearance of the project alternatives. Such simulations are necessary to provide a basis for comparing the visual effects of the proposed project with those of the project alternatives in order to determine whether, in what way, and to what extent the visual effects of the alternatives could be different from those of the proposed project. Thus, there is no evidence for the conclusion that there would be significant unmitigable impacts under the proposed project but that the impacts would be less than significant under the Phased Build Alternative.

F3-411

#### Page D.18-10

##### DEIR/DEIS Text:

**San Timoteo Canyon Road.** The linear viewpoint analysis addressed the full extent of San Timoteo Canyon Road (see Figure D.18-7C) from its intersection with Barton Road in the north to its southern terminus with Oak Valley Parkway, a linear distance of almost 11.5 miles (northbound travel direction). As shown in Table D.18-8, the Proposed Project would be either not visible (due to screening by terrain and roadside vegetation) or visible but not noticeable for approximately 46 percent of the combined (northbound-southbound) travel distance of slightly more than 22.6 miles. However, given the Proposed Project's relatively close proximity to San Timoteo Canyon Road and frequent superior (elevated) location along the southern ridgeline, the Proposed Project would be prominently visible for 43 percent of the combined travel distance. However, at no point would the Proposed Project appear to be a dominant visual feature.

##### SCE Comment:

For clarification, please make the following revision:

**San Timoteo Canyon Road.** The linear viewpoint analysis addressed the full extent of San Timoteo Canyon Road (see Figure D.18-7C) from its intersection with Barton Road in the north to its southern terminus with Oak Valley Parkway, a linear distance of almost 11.5 miles (northbound travel direction). As shown in Table D.18-8, the Proposed Project would be either not visible (due to screening by terrain and roadside vegetation) or visible but not noticeable for approximately 46 percent of the combined (northbound-southbound) travel distance of slightly more than 22.6 miles. Given the Proposed Project's relatively close proximity to San Timoteo Canyon Road and frequent superior (elevated) location along the southern ridgeline, the Proposed Project would be prominently visible for 43 percent of the combined travel distance consistent with the visibility of the current energy transmission infrastructure. However, at no point would the Proposed Project appear to be a dominant visual feature.

F3-412



### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.18-11

##### DEIR/DEIS Text:

Viewer Concern. High. Although energy transmission infrastructure dominates the foreground views from the park within the corridor, from adjacent residential neighborhoods, and from roads that are spanned by the ROW and adjacent to the park, viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change.

##### SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #1, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same. The environmental setting fails to recognize or make mention of the prominence of the 66 kV lines that would be removed from the ROW.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

F3-413

#### Page D.18-12

##### DEIR/DEIS Text:

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground views from the residential neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change.

##### SCE Comment:

The environmental setting recognizes, that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #2, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

F3-414

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page D.18-13

#### DEIR/DEIS Text:

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change.

#### SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #3, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

F3-415

### Page D.18-14

#### DEIR/DEIS Text:

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape, residents and travelers on San Timoteo Canyon Road would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change.

#### SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #4, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

F3-416

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.18-15**

**DEIR/DEIS Text:**

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background ridges or sky) an adverse visual change.

**SCE Comment:**

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #5, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

**Page D.18-15**

**DEIR/DEIS Text:**

Viewer Concern. High. Although energy transmission infrastructure dominates the foreground views from the park within the corridor, from adjacent residential neighborhoods, and from roads that are spanned by the ROW and adjacent to the park, viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change.

**SCE Comment:**

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #6, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the park is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

**F3-417**

**F3-418**

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.18-16**

**DEIR/DEIS Text:**

Viewer Concern. High. Visitors to the golf course and adjacent residents expect to see a landscape with high aesthetic appeal, characterized by a mosaic of natural and managed vegetative forms. Any additional intrusion of built structures with industrial character or blockage of views from any of the golf course grounds would be seen as an adverse visual change.

**SCE Comment:**

The environmental setting fails to recognize that energy transmission infrastructure dominates the foreground views from a variety of locations. The text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #7, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the greenbelt is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider that "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

**F3-419**

**Page D.18-16**

**DEIR/DEIS Text:**

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky and Mt. San Jacinto) an adverse visual change.

**SCE Comment:**

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #8, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

**F3-420**

### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.18-17

##### DEIR/DEIS Text:

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky) an adverse visual change.

##### SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #9, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

F3-421

#### Page D.18-18

##### DEIR/DEIS Text:

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape at the base of the hills, travelers on Bluff Street and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, hills, and mountains) an adverse visual change.

##### SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #10, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

F3-422



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.18-18**

**DEIR/DEIS Text:**

**Viewer Concern.** High. Although the foreground landscape is disturbed, and existing utility infrastructure is noticeable in views from Hathaway Street, travelers and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, hills, and mountains) an adverse visual change.

**SCE Comment:**

The environmental setting recognizes that energy transmission infrastructure is noticeable from a variety of locations, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #11, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

**F3-423**

## Comment Set F3: Southern California Edison Company (cont.)

Pages D.18-18 through 19

### DEIR/DEIS Text:

General Comment identifying issues associated with CPUC Preferred Alternative

#### **KOP 11 – Hathaway Street in Banning**

Figure D.18-18A presents a life-size scale view to the northeast toward the Proposed Project across the southwest corner of the Morongo Tribal Lands, from the entrance to the Summit Ridge Apartments on Hathaway Street, in eastern Banning. The view encompasses the ROW as it passes across the corner of the tribal lands, north of I-10, and adjacent to the eastern border of the City of Banning. The San Bernardino Mountains provide a backdrop of visual interest in views to the north and northeast.

**Visual Quality.** Low to Moderate. The foreground landscape is disturbed and undeveloped, is generally lacking features of visual interest, and exhibits minimal visual variety. Existing utility infrastructure (distantly visible) further compromises views of the background San Bernardino Mountains, which do provide a backdrop of visual interest.

**Viewer Concern.** High. Although the foreground landscape is disturbed, and existing utility infrastructure is noticeable in views from Hathaway Street, travelers and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, hills, and mountains) an adverse visual change.

**Viewer Exposure.** Moderate to High. The Proposed Project would be highly visible in the foreground views from travelers on Hathaway Street and adjacent residences. The number of viewers would be Low, and the duration of view would be Extended. Combining the four equally weighted factors (i.e., visibility, distance zone, number of viewers, and duration of view) results in an overall rating of Moderate to High for viewer exposure.

**Overall Visual Sensitivity.** Moderate to High. For viewers in the vicinity of KOP 11, combining the equally weighted Low to Moderate visual quality, High viewer concern, and Moderate to High viewer exposure results in an overall rating of Moderate to High for visual sensitivity of the visual setting and viewing characteristics.

### SCE Comment:

The discussion of visual quality and viewer concern should be revised to reflect the fact that the area in the immediate foreground of the view is used by the Orco Block Company. Because of this use of the site, the surface of the site is highly disturbed. Street View photos of the site taken from Hathaway Street in front of the apartment complex show large piles of concrete blocks stacked up in the area immediately to the east of the fence along Hathaway street, and a number of large, industrial-appearing features on the site, including several large steel buildings and a cluster of stacks and silos. Because of the presence of this Orco Block operation in the immediate foreground of the view, the view is far from pristine, and thus the level of visual quality would be more accurately characterized as low to moderate and the level of concern as moderate.

The assessment of viewer exposure should be lowered to moderate, at most. In reality, the numbers of viewers and the duration of viewers and the duration of views would be lower than is asserted here. The Summit Ridge apartment complex is internally focused, with only some of the buildings fronting along Hathaway Street. As a result, for most of the units in the complex views toward the east where the proposed transmission line would be located, the views are blocked by the buildings on the east side of the complex. For those units located in buildings along the complex's eastern perimeter, views toward the proposed transmission alignment are screened by large trees planted in the landscape strip that borders the edge of the complex along Hathaway Street. For most residences of the Summit Ridge Apartment, views looking toward the project would only occur as they exit the apartment complex onto Hathaway Street. These views would be of short duration and given the need for drivers to pay attention to traffic as they turn onto Hathaway Street, it is reasonable to assume that the attention paid to the distant view may be limited. For drivers traveling on Hathaway Street, the elapsed time on this segment of the street would be low and their view toward the transmission line alignment would be outside of their primary cone of vision.

Taking into account the contextual factors and the at-most moderate level of viewer exposure, the overall level of visual sensitivity of this view should be reduced to moderate.

F3-424

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.18-19**

**DEIR/DEIS Text:**

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape when viewed from the community center, visitors to the community center would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, and Mount San Jacinto) an adverse visual change.

**SCE Comment:**

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #12, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

**Page D.18-20**

**DEIR/DEIS Text:**

Viewer Concern. High. Although energy transmission infrastructure features prominently in the landscape visible within this community, residential viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, or Mount San Jacinto if viewing to the south) an adverse visual change.

**SCE Comment:**

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #13, the Proposed Project incorporates the use of lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain and for residences in this location are generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

F3-425

F3-426



**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.18-21**

**DEIR/DEIS Text:**

Viewer Concern. High. Although energy transmission infrastructure features prominently in the western San Geronio Pass landscape visible from the PCT and parking lot, trail users would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, or Mount San Jacinto) an adverse visual change.

**SCE Comment:**

The environmental setting fails to recognize the significance distance of energy transmission infrastructure from the current view. The text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #14, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

**Page D.18-22**

**DEIR/DEIS Text:**

Viewer Concern. High. Travelers on Whitewater Canyon Road, including residents from the nearby residential enclave of Bonnie Bell, would consider any increase in industrial character or built structural prominence in the canyon, or view blockage of the background sky and Mount San Jacinto an adverse visual change.

**SCE Comment:**

The environmental setting does not recognize that energy transmission infrastructure and wind generation facilities dominate the foreground views from a variety of locations. The text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #15, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

F3-427

F3-428

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page D.18-23

#### DEIR/DEIS Text:

Viewer Concern. High. Residential viewers in this portion of Whitewater would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, and Mount San Jacinto) an adverse visual change.

#### SCE Comment:

The environmental setting does not recognize that energy transmission infrastructure and wind generation facilities dominate the foreground views from a variety of locations. The text subjectively states that, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #16, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider that "any" change as an adverse visual change should be removed from the environmental setting.

F3-429

### Page D.18-23

#### DEIR/DEIS Text:

Viewer Concern. High. SR 62 is an Officially Designated State Scenic Highway and, therefore, warrants a high rating for viewer concern. Although travelers on this stretch of SR 62 would not likely notice the change in conductors and structure configurations that would occur from the Proposed Project, given the existing structural context, any perceived increase in industrial character, structure prominence, or view blockage would be experienced as an adverse visual impact.

#### SCE Comment:

The environmental setting recognizes that energy transmission infrastructure changes would not likely be perceptible, however, the text subjectively states, "...any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #17, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

F3-430

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.18-24**

**DEIR/DEIS Text:**

Viewer Concern. High. Travelers on Iowa Street and adjacent residents would consider the introduction of prominent energy infrastructure with its associated industrial character and view blockage of higher value landscape features (background sky and mountains) an adverse visual change.

**SCE Comment:**

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider “any” increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider “any” change an adverse visual change should be removed from the environmental setting. Please see the suggested revision below:

Viewer Concern. High. Travelers on Iowa Street ~~currently see utility infrastructure as seen in KOP #18, and adjacent residents would consider the introduction of prominent energy infrastructure with its associated industrial character and view blockage of higher value landscape features (background sky and mountains) an adverse visual change.~~

**F3-431**

**Page D.18-33**

**DEIR/DEIS Text:**

**VR-1a Screen construction activities from view.** Construction yards, staging areas, and material and equipment storage areas, including storage sites for excavated materials, shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least 60 days prior to the start of construction at that site.

**SCE Comment:**

Mitigation Measure VR-1a is unnecessarily restrictive; please make the following revisions:

**VR-1a Screen construction activities from view.** Construction yards, staging areas, and material and equipment storage areas, ~~including storage sites for excavated materials,~~ shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least 60 7 days prior to the start of construction at that site.

**F3-432**

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.18-34

**DEIR/DEIS Text:**

**VR-2a Minimize vegetation removal and ground disturbance.** Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.

**SCE Comment:**

The project as designed depicts the maximum amount of disturbance necessary for construction. Ultimately SCE's disturbance areas will be limited to the sufficient areas needed to feasibly construct the proposed project in a safe and efficient manner. As such please make the following revisions:

**VR-2a Minimize vegetation removal and ground disturbance.** Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. ~~In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.~~

F3-433

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-34

DEIR/DEIS Text:

**VR-2a Limit ground disturbance in Segments 2, 3, and 6.** Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas. Parking areas and staging and disposal site locations shall be similarly located in areas approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.

SCE Comment:

Mitigation Measure VR-2a improperly defers analysis of impacts to a post-approval stage. The mere fact that there may be some areas of potentially significant impacts within Segments 2, 3 and 6 does not justify a post-approval consultation for the entirety of Segments 2, 3, and 6. Under Mitigation Measure VR-2a, the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist will consult on staking to *all* staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils to minimize the visibility of ground disturbance. Mitigation Measure VR-2a also gives the "CPUC/BLM Visual Specialist and Designated Project Biologist" discretion to require changes in project design, which could cause delays and implicate other engineering and environmental topic areas.

CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. See CEQA Guidelines §15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. See CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. See *Riolto Citizens For Responsible Growth v. Wlo-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012). As such, please make the following revisions:

**VR-2a Minimize vegetation removal and ground disturbance.**

**Limit ground disturbance in Segments 2, 3, and 6.** Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define the limits of the Proposed Project disturbance areas staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas. Parking areas and staging and disposal site locations shall be similarly located in approved areas. approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.

F3-434



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-35

DEIR/DEIS Text:

***Mitigation Measure for Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces***

**VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces.** Where construction would unavoidably create land scars or retaining walls visible from sensitive public viewing locations, disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar). The material shall be approved by the CPUC and BLM, and the intent shall be to reduce the visual contrast created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.

**SCE Comment:**

Application of treatments for temporary areas (disturbed soils) creates artificial blending that is less desirable at the expense of eventual natural blending. Land scars would only remain in areas used permanently and these areas are inappropriate for treatment. The mitigation measure as written is excessive. Additionally, between the PEA and SCE's responses to data requests, there is ample information about the project's ground disturbance and retaining walls to determine which specific locations may cause significant impacts to visual resources. In other words, the DEIR/DEIS must identify *which specific retaining walls or grading areas* will result in a potentially significant impact, not just those visible from sensitive public viewing locations, especially as sensitive viewing locations are not defined in the DEIR/DEIS. The document should not simply conclude that such activities could generically cause potentially significant impacts across the entirety of the Project.

SCE believes there are few, if any, areas within where construction ground disturbance and retaining will result in a potentially significant visual impacts requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established ROW with existing transmission line infrastructure, substantially reducing the potential for significant visual impacts. The PEA concludes that construction activities would not result in significant impacts to visual resources because construction activities are temporary and the proposed project includes restoration of laydown/work areas through recontouring and revegetation at the end of construction.<sup>1</sup>

Second, Mitigation Measure VR-3a improperly defers analysis of impacts to a post-approval stage. The mere fact that there may be some areas of potentially significant impacts does not justify a post-approval analysis for the entirety of Proposed Project. Under Mitigation Measure VR-3a, SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants, implying discretion or future analysis would be required.

CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. See CEQA Guidelines §15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. See CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. See *Rioño Citizens For Responsible Growth v. Wla-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012). as such, please make the following revisions:

***Mitigation Measure for Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces***

**VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces.** Where construction would unavoidably create land scars or retaining walls that have been identified as creating a significant visual impact, visible from sensitive public viewing locations, disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar) with the intent to reduce the visual contrast created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.

<sup>1</sup> *Id.*

F3-435

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-35

DEIR/DEIS Text:

**VR-4a Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.

In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:

- Approximate location, lakes, and design of alternative access or spur road routes that would replace proposed roads.
- Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts.
- Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery.
- The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.

**SCE Comment:**

Impact VR-4 indicates that, within Segments 2, 3, 4 and 6, construction of the Proposed Project on hilltops and hillsides may "create extended, in-line view of newly graded terrain" which "can exacerbate the visibility, prominence, and overall visible contrast of graded surfaces such that the overall level of visual change becomes Moderate to High."<sup>2</sup> The DEIR/DEIS identifies this as a potentially significant impact that can be reduced to less than significance with the imposition of mitigation.<sup>3</sup>

To address this impact, Mitigation Measure VR-4a requires SCE to submit a "map book and description of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6" (emphasis added), which will be analyzed by the CPUC's Visual Specialist "to assess in-line visibility of these Proposed Project features" from undefined "sensitive viewing locations." In response to the Visual Specialist's analysis, SCE shall "develop design options to reduce the in-line visibility of these components," after which, the "CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs."

SCE has three primary concerns with Mitigation Measure VR-4a, discussed next. Based on these comments, SCE proposes changes to the measure in redline format, provided below.

First, the scope of impact conclusion is far too broad because the Draft EIR/EIS does not address *where* potentially significant impacts from spur roads, retaining walls, and ground disturbance will occur within Segments 2, 3, 4 and 6. CEQA requires an EIR to evaluate and conclude whether specific activities are significant, not simply reach generalized findings. See *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.*, 47 Cal. 3d 376, 404 (1988). An EIR cannot merely label an impact significant without first providing a detailed discussion and analysis supporting the specific impact conclusion. See *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs*, 91 Cal. App. 4th 1344, 1370 (2001).

<sup>2</sup> Draft EIR/EIS, p. D.18-35.

<sup>3</sup> Draft EIR/EIS, p. D.18-60.

F3-436

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Between the PEA and SCE's responses to data requests, there is ample information about the project's ground disturbance, retaining walls and spur roads to determine which specific construction activities and locations may cause significant impacts to visual resources. In other words, the EIR/EIS must identify *which specific* spur roads, retaining walls or grading areas will result in a potentially significant impact, and not simply conclude that such activities could generically cause potentially significant impacts across the entirety of Segments 2, 3, 4 and 6. Once the scope of the impact is identified, Mitigation Measure VR-4a can be properly tailored to address the specific impact areas (see comment below).

SCE believes there are few, if any, areas within Segments 2, 3, 4 and 6 where construction ground disturbance, retaining walls and spur roads will result in a potentially significant visual impacts requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established ROW with existing transmission line infrastructure, substantially reducing the potential for significant visual impacts. The PEA concludes that construction activities would not result in significant impacts to visual resources because construction activities are temporary and the proposed project includes restoration of laydown/work areas through re-contouring and revegetation at the end of construction.<sup>4</sup>

Second, Mitigation Measure VR-4a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some areas of potentially significant impacts within Segments 2, 3, 4 and 6 does not justify a post-approval analysis for the entirety of Segments 2, 3, 4 and 6. Under Mitigation Measure VR-4a, the "Visual Specialist" will analyze impacts to *all* access and spur roads, retaining walls, and ground disturbance areas in Segments 2, 3, 4 and 6 to determine the potential for impacts. Mitigation Measure VR-4a also gives the "CPUC/BLM Visual Specialist and Designated Project Biologist" discretion to require changes in project design, which could cause delays and implicate other engineering and environmental topic areas.

CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. See CEQA Guidelines §15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. See CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. See *Rialto Citizens For Responsible Growth v. Wlo-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012).

While some impact determinations require post-approval analysis, that is not the case here. The information requested in Mitigation Measure VR-4a has already been provided by SCE, supporting an analysis in the Draft EIR/EIS, consistent with CEQA and NEPA. To the extent that some additional analysis is required, it should be limited to specific areas where: (1) the EIR identifies a potentially significant impact, not the entirety of the Segment 2, 3, 4 and 6 (see prior comment); and (2) the final design is materially different from the design that SCE has already provided.

Third, to the extent that SCE must incorporate additional design features to mitigate potentially significant impacts from ground disturbance, retaining walls or spur roads, the options should be clearly identified in Mitigation Measure VR-4a. See CEQA Guidelines § 15126.4(a)(1)(B).

Accordingly, based on the reasons provided above Mitigation Measure VR-4a should be removed from the DEIR/DEIS.

**VR-4a Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.

F3-436  
cont.

<sup>4</sup> Id.



**Comment Set F3: Southern California Edison Company (cont.)**

In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the followings:

- Approximate location, length, and design of alternative access or spur road route that would replace proposed roads;
- Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts;
- Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery.
- The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impact of the alternate road designs are less than that of the original access road designs.

**F3-436  
cont.**

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.18-36

**DEIR/DEIS Text:**

**VR-5a: Prohibit construction marking of natural features.** SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose.

**SCE Comment:**

The following clarifying information is recommended:

**VR-5a: Prohibit construction marking of natural features.** SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose. This measure does not apply to temporary marking agents used to identify underground utilities.

F3-437

Page D.18-45

**DEIR/DEIS Text:**

**General Comment identifying issues associated with CPUC Preferred Alternative**

From the analysis of impacts on KOP 8-Stargazer Street in the Estates Residential Development in the City of Beaumont

The impact would be substantial for about 10 percent of south-side residences: those that would be located adjacent to a proposed new structure pair. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects along this portion of the Proposed Project. In addition, the Tower Relocation Alternative defined in Section C and Appendix 5, would require specific structure pairs with the most severe visual impacts to be moved farther from residences, reducing the severity of the visual impact. The effects of this alternative are presented in Section D.18.4.1.

**SCE Comment:**

These findings vary substantially from the findings that were based on a review of the existing and simulated with-project views from KOP 8, seen in Figures D.18-15A and D.18-15B.

There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts.

F3-438

Page D.18-46

**DEIR/DEIS Text:**

**General Comment identifying issues associated with CPUC Preferred Alternative**

From the analysis of impacts on KOP 9-Cedar Hollow Road in the City of Beaumont:

The visual effects would be substantial for approximately 10 percent of south side residences — those located adjacent to a proposed new structure pair. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects along this portion of the Proposed Project. In addition, the Tower Relocation Alternative defined in Section C and Appendix 5, would require specific structure pairs with the most severe visual impacts to be moved farther from residences, reducing the severity of the visual impact. The effects of this alternative are presented in Section D.18.4.1.

**SCE Comment:**

These findings vary substantially from the findings that were based on a review of the existing and simulated with-project views from KOP 7 seen in Figures D.18-16A and D.18-16B.

There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts.

F3-439

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.18-47**

**DEIR/DEIS Text:**

**General Comment identifying issues associated with CPUC Preferred Alternative**

From the analysis of impacts on KOP 11-Hathaway Street in the City of Banning

Figure D.18-18B presents a visual simulation of two new transmission lines that would be introduced into an area absent such features but with existing wood-pole utility lines present in the foreground of views. Given the relatively unobstructed viewing opportunities of the transmission line corridor and the mountains beyond, travelers on Hathaway Street and adjacent residents would be afforded Extended viewing durations of the Proposed Project. Also, given the close proximity and relatively large scale of the transmission lines, atmospheric conditions would have minimal effect on the viewing experience.

As shown in the simulation, two double-circuit TSP transmission lines would be introduced into a fore-ground landscape presently absent similar features. The TSPs would appear as visually prominent, vertical structures that would result in Moderate to High visual contrast. The TSPs would appear Co-dominant in scale with the more distant background mountains. View blockage of the background sky, hills, and mountains would be Moderate to High. The overall visual change would be Moderate to High, and in the context of the existing landscape's Moderate to High visual sensitivity, the resulting visual effect would be substantial. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects. These severe visual effects could be reduced if the proposed new structures were located about 500 feet farther east. However, as described in Appendix 5, Section 5.7, the structures are located on Morongo Tribal Lands, and the Morongo Band of Mission Indians is not willing to consider this relocation, so an alternative that would reduce the severity of this impact is not feasible.

**SCE Comment:**

The finding of a significant and unmitigable visual impact on this view is not supported by the evidence.

Based on a comparison of the simulation with the existing condition view, it is clear that the level of visual change has been overestimated. The proposed transmission structures are declared to be "co-dominant" in relationship to the scale of the mountains in the backdrop. Given the fact that the mountains are higher and more massive in scale than the proposed transmission structures, it would be more accurate to characterize the structures as being subordinate in relationship to the mountains. View blockage has been incorrectly classified as "moderate to high". Given the slim profiles of the transmission structures, their actual blockage of views toward landscape elements behind them is quite small, resulting in a level of view blockage that would be more accurately classified as "low" as opposed to "moderate to high". Taking the visually subordinate character of the structures and the low level of view blockage into account, the overall level of visual change would be more correctly determined to be "moderate" than "moderate to high". As indicated in the comments made related to text on pages D.18-18 and D.18-19, the correct assessment of the sensitivity of this view is moderate, rather than moderate to high. Given the moderate level of visual sensitivity and the overall moderate level of visual change, applying the assumptions indicated in Table D.18-9, the level of impact would be less than significant.

**F3-440**

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-S2 and Figure D.18-25B

### DEIR/DEIS Text:

**KOP 18 – Northbound Iowa Street in the City of Redlands.** Figure D.18-25A presents a life-size scale view to the north along the Iowa Street, near the southwest corner of the Cottage Lane residential sub-division, south of Orange Avenue and North of Barton Road in the City of Redlands. The view encompasses a portion of the Proposed Project SB-Redlands-Tennessee overhead 66 kV subtransmission line as it passes immediately west of the Cottage Lane residential subdivision. There are no other substantial overhead utility structures apparent in the suburban landscape along this portion of Iowa Street. Figure D.18-25B presents a simulation of a new 66 kV subtransmission line in this suburban neighborhood.

As shown in the simulation, the Proposed Project would result in the introduction of a light-weight, steel-pole, 66 kV subtransmission line into a residential suburban landscape presently absent similar features. The light-weight steel poles would appear as visually prominent, vertical structures along the east side of Iowa Street adjacent to the Cottage Lane residential subdivision. The resulting visual contrast would be Moderate to High, and the light-weight steel poles would appear Co-dominant in scale with the more distant background mountains. View blockage of the mountains and sky would be Moderate to High

### SCE Comment:

Figure D-18-25B improperly simulates the installation of double-circuit 220kV TSPs (with a typical as shown in Figure B-10), instead of the correct use of single-circuit 66kV wood poles (with typical as shown in Figure B-14b). If this simulation had incorporated the correct structure type, it would show that the Proposed Project creates a similar visual impact as the "single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street" and the "...vertical street light poles and a more distant communication tower." (See DEIR page D.18-24, KOP-18, Visual Quality.)

The DEIR language should be revised as follows:

**KOP 18 – Northbound Iowa Street in the City of Redlands.** Figure D.18-25A presents a life-size scale view to the north along the Iowa Street, near the southwest corner of the Cottage Lane residential sub-division, south of Orange Avenue and North of Barton Road in the City of Redlands. The view encompasses a portion of the Proposed Project SB-Redlands-Tennessee overhead 66 kV subtransmission line as it passes immediately west of the Cottage Lane residential subdivision. There are no other substantial overhead utility structures apparent in the suburban landscape along this portion of Iowa Street, though there are some single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street, as well as some vertical street light poles and a more distant communication tower. Figure D.18-25B presents a simulation of a new 66 kV subtransmission line in this suburban neighborhood.

As shown in the simulation, the Proposed Project would result in the introduction of a light-weight, steel ~~wood~~-pole, 66 kV subtransmission line into a residential suburban landscape ~~presently absent similar features.~~ The ~~light-weight steel~~ wood poles would appear as visually prominent, vertical structures along the east side of Iowa Street adjacent to the Cottage Lane residential subdivision. The resulting visual contrast would be Low to Moderate to High, and the ~~light-weight steel poles would~~ could appear Co-dominant in scale with the more distant background mountains. View blockage of the mountains and sky would be Low to Moderate to High

F3-441

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-54

DEIR/DEIS Text:

**Mitigation Measure for Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality**

**VR-8a Minimize visual contrast in project design.** In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast.

The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.

- **Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.
- **Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.
- **Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmission line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.

A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-prepare and submit for review and approval a revised plan.

**SCE Comment:**

The Draft EIR/EIS Impact VR-8 analyzes whether the long-term presence of the project would result in landscape changes that degrade the existing visual character or quality. CEQA requires evaluating a project against the existing environmental setting (i.e., the baseline). Here, the project will be developed almost entirely within previously disturbed areas or established rights-of-way with existing transmission line infrastructure. Given the highly disturbed nature of the existing setting, the incremental visual changes from the project are relatively minor or even beneficial. As such, the PEA concluded the project would not significantly degrade the visual character or quality of the surrounding area.<sup>5</sup>

The Draft EIR also concludes that the large majority of the project along 48 corridor miles would either result in a *beneficial* impact or a less than significant impact. Significant impacts were limited to the following locations:<sup>6</sup>

- Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane.
- Segment 5 when viewed from residences on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning.
- Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the community of Whitewater.
- The Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands.

Appendix 10 of the Draft EIR, Table AP.10-1, summarized next, illustrates that significant operational impacts were limited in scope compared to the rest of the project (locations with a significant visual impact are bolded):

<sup>5</sup> Proponent's Environmental Assessment, p. 4.1-38.

<sup>6</sup> Draft EIR, p. D.18-6.

F3-442



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

KOP	CEQA Impact Significance Determination
KOP 1 – Right-of-Way Crossing of Mission Road in Loma Linda	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 2 – Canyon Vista Dr. and East Chase Canyon Lane in Colton	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 3 – Pilgrim Road in San Timoteo Canyon	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 4 – Westbound San Timoteo Canyon Road	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 5 – Boros Boulevard – Tukwet Canyon	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 6 – Stetson Community Park in the City of Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) <b>Some Views South of ROW: Significant (Class I)</b>
KOP 7 – Oak Valley Golf Course	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) <b>Some Views South of ROW: Significant (Class I)</b>
KOP 8 – Stargazer St. and Rose Ave. in The Estates Residential Development in the City of Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) <b>Some Views South of ROW: Significant (Class I)</b>
KOP 9 – Cedar Hollow Road in Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) <b>Some Views South of ROW: Significant (Class I)</b>
KOP 10 – Bluff Street in Banning	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 11 – Hathaway Street in Banning	<b>BEFORE: Significant and Unmitigable (Class I)</b> AFTER: Same
KOP 12 – Morongo Community Center	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 13 – Haugen-Lehmann Way in the Central Portion of the Community of Whitewater	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 14 – Pacific Crest Trail Trailhead / Parking Lot	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 15 – Whitewater Canyon Road, South of Bonnie Bell	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 16 – Painted Hills Road in the Community of Whitewater	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 17 – Southbound State Route 62 Scenic Hwy.	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 18 – Northbound Iowa Street in the City of Redlands	<b>BEFORE: Significant and Unmitigable (Class I)</b> AFTER: Same

F3-442  
cont.

### Comment Set F3: Southern California Edison Company (cont.)

Under CEQA, "[m]itigation measures are not required for effects which are not found to be significant." CEQA Guidelines § 15126.4(a)(3); see also *Son Franciscoans for Reasonable Growth v. City & County of San Francisco*, 209 Cal. App. 3d 1502, 1517 (1989) (an exaction for open space and parks not required because the EIR concluded impacts requiring such mitigation were not significant); *North Coast Rivers Alliance v. Marin Mun. Water Distr.*, 216 Cal. App. 4th 614, 649 (2013) (mitigation for energy impacts not needed where EIR determined the project's energy impacts would not be significant).

When mitigation is imposed, CEQA requires that the lead agency limit the scope of the mitigation to match the nature of the impact. CEQA Guidelines § 15126.4(a)(4) requires:

There must be an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest. *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987); and

The mitigation measure must be "roughly proportional" to the impacts of the project. *Dolan v. City of Tigard*, 512 U.S. 374 (1994).

In contrast to the clear limits imposed by CEQA, the Draft EIR/EIS applies Mitigation Measures VR-8a across the entirety of the project, not just the locations where a significant visual impact would occur. The Draft EIR recommends that Measures VR-8a apply to sections with a less than significant impact to "further reduce the adverse visual effects," and to sections with beneficial impacts to "further ensure that the resulting impacts are an improvement and are, in fact, beneficial."<sup>7</sup>

Simply put, this approach is not consistent with CEQA. Mitigation measures should only be applied to reduce significant environmental impacts, not to "further reduce" less than significant impacts or to ensure that beneficial impacts occur. As proposed, Mitigation Measures VR-8a would impose substantial costs and effort on SCE that are not connected to or roughly proportional to the limited nature of the impact. The measures effectively require the entirety of the project to be reevaluated for visual effects based on the criteria in Mitigation Measures VR-8a even though the vast majority of project components would not result in a significant environmental impact.

As discussed in the PEA, SCE will reduce visual impacts across the entirety of the project by applying design features intended to reduce visual effects, including revegetation, recontouring, use of appropriate materials, light shielding, and glare reduction as appropriate. However, except for the limited locations identified in the Draft EIR/EIS where significant visual impacts will occur, no additional mitigation is permitted under CEQA. As such, SCE respectfully proposes mitigation measure VR-8a be removed from the DEIR/DEIS.

***Mitigation Measure for Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality***

**VR-8a Minimize visual contrast in project design.** In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these design fundamentals shall be based on the following factors:

- **Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.
- **Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.
- **Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access- and spur-roads and disturbed areas created during construction (transmission-line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.

A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan.

<sup>7</sup> Draft EIR, p. D.IJ-61.

F3-442  
cont.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-55

DEIR/DEIS Text:

**Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare**

**VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The transmission structures and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-proposed Project elements.

SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.

**SCE Comment:**

The analysis related to mitigation measure VR-9, states the following:

Steel Structure Glare and Reflectivity. Components of new steel transmission structures can be reflective and highly visible in sunlight, even creating distractions to motorists and nearby residents. Therefore, the long-term presence of the Proposed Project could create a new source of reflective glare and surface color contrast that could adversely affect daytime views along much of the Proposed Project route. However, the visibility and reflectivity of new structures can be minimized with various surface treatments. Mitigation Measure VR-9a (Treat structure surfaces) is recommended to minimize the views of these facilities.

That analysis fails to recognize that there are existing steel transmission structures within the same corridor as the new structures and there would be no new source of reflective glare and surface color contrast. As noted in the PEAs<sup>8</sup>, new structures and conductors would weather to a dull gray finish. Thus, colors would be consistent with the existing visual condition and approval of specific colors for towers and conductors is unnecessary. Furthermore for the same reasoning explained for measure VR-8 (mitigation not required for impacts not found to be significant, scope of mitigation to match nature of the impact), mitigation measure VR-9 should be removed from the DEIR/DEIS

**Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare**

**VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The transmission structures and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-proposed Project elements.

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<sup>8</sup> Proponent's Environmental Assessment, p. 4.1-39



Comment Set F3: Southern California Edison Company (cont.)

SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications:

F3-443  
cont.

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-59

**DEIR/DEIS Text:**

**Impact VR-1C: Construction would result in adverse visual effects due to the presence of equipment, vehicles, materials, and workforce, or use of night lighting (Class II) [For connected actions]**

Construction of the connected actions would cause temporary visual contrast and degradation of the construction sites and yards, staging areas, and surrounding landscapes due to the presence of equipment, vehicles, materials, workforce, and potentially, night lighting. Due to the relatively short-term nature of this impact, these construction characteristics would be consistent with the BLM VRM Class Management Objectives. The overall visual impact would be adverse due to the substantial visual contrast associated with the construction activities; however, with implementation of Mitigation Measures VR-1a (Screen construction activities from view) and VR-7a (Minimize night lighting at project facilities), this impact would be less than significant (Class II).

**SCE Comment:**

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.18-61

**DEIR/DEIS Text:**

**General Comment identifying issues associated with CPUC Preferred Alternative**

**Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Class I, III, or IV depending on location)**

The long-term presence of the Proposed Project would result in various levels of perceived landscape changes ranging from Significant and Unmitigable (Class I) to Less Than Significant (Class III) to Beneficial (Class IV), depending on the location:

- **Significant and Unmitigable (Class I)** visual impacts would occur for the Proposed Project in the following locations:
  - (a) Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane.
  - (b) Segment 5 when viewed from residences on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning.
  - (c) Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the community of Whitewater.
  - (d) The Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands.

In all cases, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are required to reduce the severity of adverse visual impacts, though they would remain significant. These impacts would be less than significant with implementation of the Tower Relocation Alternative and the Iowa Street 66 kV Underground Alternative, as discussed in Sections D.18.4.1 and D.18.4.2, respectively.

**SCE Comment:**

No tangible evidence has been presented in the analysis to support the conclusions that have been made regarding the significant and unmitigable impacts labeled a, b, and c.

F3-444

F3-445

**Comment Set F3: Southern California Edison Company (cont.)**

**Pages D.18-61 through 62**

**DEIR/DEIS Text:**

**Impact VR-8C: Long-term presence of the project would result in landscape changes or new sources of light and glare that degrade existing visual character or quality (Class I or III depending on location) [For connected actions]**

For connected actions, their long-term presence would result in various levels of perceived landscape changes ranging from Significant and Unmitigable (Class I) to Less Than Significant (Class III), depending on location....

In all cases, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are required to reduce the severity of adverse visual impacts, though they would remain significant...

Because NEPA requires implementation of feasible mitigation for impacts regardless of severity, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) would further reduce the adverse visual effects.

**SCE Comment:**

The DEIR should clarify that the potential mitigation measures referenced for connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-446

**Pages D.18-68 through 69**

**DEIR/DEIS Text:**

**D.18.4.3 Phased Build Alternative**

**Impact VR-1:** Construction would result in adverse visual effects due to the presence of equipment, vehicles, materials, and workforce

**Impact VR-2:** Construction would result in visual contrast due to vegetation removal

**Impact VR-3:** Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces

**Impact VR-4:** Construction could result in visual contrast associated with in-line views of retaining walls and land scars

**Impact VR-5:** Construction could result in visual contrast associated with the marking of natural features

**Impact VR-6:** Construction could result in visual contrast associated with fugitive dust, waste, and trash

**Impact VR-7:** Construction could result in the use of night lighting or installation of reflective surfaces, which could cause undesirable night light and glare effects

**SCE Comment:**

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional visual impact analysis. The additional disturbance areas and the increased duration could result in additional visual impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

F3-447

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-70

### DEIR/DEIS Text:

#### **Impact VR-6: Construction could result in visual contrast associated with fugitive dust, waste, and trash**

Grading activities for the construction of specific sites, access roads, and spur roads have the potential to generate dust clouds, creating visual contrast that can substantially degrade the quality of a site. Implementation of Mitigation Measure AQ-1a (Control fugitive dust; see Section D.3, Air Quality) can reduce this impact. Also, during construction, there is the potential for trash and food-related waste to be discarded inappropriately at construction sites and then be transported by wind and/or animals across the landscape, resulting in additional visual contrast and degradation of landscape quality and character... However, these adverse effects would be less severe than in the Proposed Project because the existing double-circuit structures would be retained and reconductored rather than replaced.

### SCE Comment:

The Phased Build Alternative actually results in greater environmental impacts than the Proposed Project because it will force multiple rounds of construction activities, possibly in short succession, prolonging the duration of noise and air pollutant exposure while increasing land disturbance and associated impacts. Please see additional comments provided in SCE's cover letter.

Page D.18-71

### DEIR/DEIS Text:

#### **General Comment identifying issues associated with CPUC Preferred Alternative**

#### **Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality**

The Phased Build Alternative would result in permanent adverse effects related to visual change perceived from sensitive viewing locations including adjacent residences, local roadways, and nearby recreation areas and facilities. The perceived visual change would be associated with new towers, conductors, and FAA hazard markers. The permanent visual changes in this alternative would be substantially reduced due to the retention of the existing set of double-circuit towers.

For some portions of the Proposed Project, the structures and/or conductors would appear immediately adjacent to residential property lines. As a result, the increased visual contrast, structure prominence, and view blockage associated with the close proximity of the structure pairs would result in a Moderate to High degree of visual change, which would constitute a substantial visual effect under the Proposed Project.

In contrast, the Phased Build Alternative would produce a less severe visual impact (compared to the Proposed Project) by retaining the set of existing double-circuit structures near the center of the ROW and constructing one new set of double-circuit structures that generally would be farther from the edge of the ROW (and in all cases no closer to the edge of the ROW) than the comparable Proposed Project structures. By shifting structures farther away from the closest residences, the Phased Build Alternative would achieve structure placements within the ROW that would appear more similar to the existing structure locations. As a result, the Phased Build Alternative would cause less incremental visual contrast, structure prominence, and view blockage compared to the Proposed Project when viewed from residential locations along the south side of the ROW. From the most adversely affected residences (those closest to a structure pair), the resulting incremental visual change (from the present condition) would be Moderate and the overall visual effect would be less than substantial. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) as described in Section D.18.3.3 above, are recommended to reduce the visual effects of the Phased Build Alternative.

### SCE Comment:

No tangible evidence is provided to support the assertions that the Phased Build Alternative would produce a less severe visual impact than the proposed project.

F3-448

F3-449

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-71

DEIR/DEIS Text:

**Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Class I)**

Under the Proposed Project, the long-term presence of the project would result in significant (Class I) visual impacts in Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane, and in Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the Community of Whitewater.

Under the Tower Relocation Alternative, these Class I visual impacts would be reduced to less than significant levels by moving the towers farther to the north away from the residences. However, the significant (Class I) visual impact in Segment 5 on Morongo Tribal Lands (when viewed from North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning) would remain Significant as the Morongo Band of Mission Indians opted not to consider tower relocation.

SCE Comment:

No tangible evidence is provided to support the assertions that the Phased Build Alternative would produce a less severe visual impact than the proposed project.

The comments related to the text on page D.18-47 make it clear that the reference to significant impacts on Morongo lands as viewed from Hathaway Street must be deleted because the impacts on this view would be less than significant.

Page D.18-75

DEIR/DEIS Text:

**VR-1a: Screen construction activities from view.** Construction yards, staging areas, and material and equipment storage areas, including storage sites for excavated materials, shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least 60 days prior to the start of construction at that site.

SCE Comment:

Mitigation Measure VR-1a is unnecessarily restrictive; please make the following revisions:

**VR-1a Screen construction activities from view.** Construction yards, staging areas, and material and equipment storage areas, ~~including storage sites for excavated materials,~~ shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least ~~60~~ 7 days prior to the start of construction at that site.

F3-450

F3-451



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-76

DEIR/DEIS Text:

**VR-2a: Minimize vegetation removal and ground disturbance.** Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.

**Limit ground disturbance in Segments 2, 3, and 6.** Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas. Parking areas and staging and disposal site locations shall be similarly located in areas approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.

**SCE Comment:**

For the reasons noted previously, please make the following revisions:

**VR-2a Minimize vegetation removal and ground disturbance.** Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. ~~In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.~~

**Limit ground disturbance in Segments 2, 3, and 6.** Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define the limits of the Proposed Project disturbance areas staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas. Parking areas and staging and disposal site locations shall be similarly located in approved areas. ~~approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.~~

F3-452

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-76

DEIR/DEIS Text:

**VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces.** Where construction would unavoidably create land scars or retaining walls visible from sensitive public viewing locations, disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar). The material shall be approved by the CPUC and BLM, and the intent shall be to reduce the visual contrast created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.

SCE Comment:

For the reasons noted previously, please make the following revisions:

**VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces.** Where construction would unavoidably create land scars or retaining walls that have been identified as creating a significant visual impact visible from sensitive public viewing locations, disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar) with the intent to reduce the visual contrast, created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.

F3-453

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-77

### DEIR/DEIS Text:

**VR-4a: Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.

In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:

- Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads.
- Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts.
- Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery.

The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.

### SCE Comment:

For the reasons noted previously, please remove mitigation measure VR-4a from the DEIR/DEIS:

**VR-4a: Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.

In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:

- Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads.
- Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts.
- Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery.

The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.

F3-454



**Comment Set F3: Southern California Edison Company (cont.)**

Page D.18-77

**DEIR/DEIS Text:**

**VR-5a: Prohibit construction marking of natural features.** SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose.

**SCE Comment:**

The following clarifications are recommended:

**VR-5a: Prohibit construction marking of natural features.** SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose. This measure does not apply to temporary marking agents used to identify underground utilities.

F3-455

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-79

DEIR/DEIS Text:

F3-456

**VR-8a: Minimize visual contrast in project design.** In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast.

The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.

- **Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.
- **Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.
- **Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmission line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.

A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-prepare and submit for review and approval a revised plan.

SCE Comment:

For the reasons noted previously, please remove mitigation measure VR-8a from the DEIR/DEIS:

~~**VR-8a: Minimize visual contrast in project design.** In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors:~~

- ~~▪ **Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.~~
- ~~▪ **Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.~~
- ~~▪ **Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmission line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.~~

~~A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-prepare and submit for review and approval a revised plan.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-80

DEIR/DEIS Text:

F3-457

*Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare*

**VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The transmission structures and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-proposed Project elements.

SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.

SCE Comment:

For the reasons noted previously, please remove mitigation measure VR-9 from the DEIR/DEIS:

*Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare*

**VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The transmission structures and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-proposed Project elements.

SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications:

### Responses to Comment Set F3 – Section D.18 Visual Resources

**F3-410** SCE asserts that the Project viewshed maps presented as Figures D.18-1 through D.18-6 do not provide sufficient information to support the analytical findings. The purpose of the referenced regional viewshed maps is to provide a graphic overview of project visibility by segment. More detailed segment visibility characterizations (that support the analyses) are provided for each representative key observation point (KOP) presented in Section D.18.1.2 (Environmental Setting by Segment), as well as the linear (roadway) viewpoints presented in Section D.18.1.1.4 (Linear Viewpoint Analysis).

The commenter also asserts that insufficient information (including simulations) has been provided to substantiate the visual impact conclusions made in the EIS regarding the various alternatives. In order to more thoroughly document, and provide evidence for, the conclusions presented for the Proposed Project, Tower Relocation Alternative, and Phased Build Alternative, an additional representative key observation point (KOP 6A) has been established for which additional analysis and a visual simulation were prepared for the Proposed Project in Section D.18.3.3 (Impacts and Mitigation Measures). Additional narrative has also been added to the discussion of the Tower Relocation Alternative (Section D.18.4.1). KOP 6A was also used as a basis for additional analysis and simulation of the Phased Build Alternative in Section D.18.4.3 (Phased Build Alternative).

In summary, the additional analyses and simulations support the conclusion that the Proposed Project would be the most visually impacting of the three tower location alternatives. The Tower Relocation Alternative, which essentially shifts the proposed structure pairs approximately 50 feet to the north would be less visually impacting than the Proposed Project but would result in varying degrees of visual impact depending on the viewing location. Residences closest to the structure pairs would derive the greatest visual benefit from the Tower Relocation Alternative because of the reduction of the looming, overhead, structural presence achieved by shifting the structures even slightly to the north, away from the residences along the south side of the ROW. The Phased Build Alternative would be the least visual impacting of the three tower location alternatives due to a more comprehensive strategy of (a) retaining the existing 220 kV structures, (b) shifting the southern-most line (structures) to the north (away from south side residences), (c) utilizing a similar (to the existing 220 kV line) structural design for the new towers, and (d) reducing overall structural clutter in the ROW (by eliminating the two smaller transmission lines).

**F3-411** The commenter notes that no simulations have been prepared for the alternatives, and thus, evidence is lacking to support the impact conclusions presented in the visual analysis. Please see Response to Comment F3-410.

**F3-412** The commenter requests that a notation be made in the discussion of the San Timoteo Canyon Road linear viewpoint analysis presented in Section D.18.1.1.4 (Linear Viewpoint Analysis) that visibility of the Proposed Project would be consistent with the visibility of the current energy transmission infrastructure. The requested notation has been added to the discussion.

**F3-413** The commenter asserts that the environmental setting for KOP 1 fails to mention the prominence of the facilities to be removed. The KOP 1 visual quality discussion in Section D.18.1.2 (Environmental Setting by Segment) provides a general characterization of the utility corridor landscape and does note the substantial industrial character within the ROW.

The commenter also asserts that the KOP discussions of viewer concern in Section D.18.1.2 (Environmental Setting by Segment) present subjectivity about adverse visual change that are inappropriate for the setting section and that there is no evidence to support the conclusion that residential viewers would consider an increase in "....industrial character, structure prominence, or view blockage of higher value landscape features" an adverse visual change.

The setting discussions of viewer concern do not evaluate visual change or suggest that such change would occur, they merely acknowledge the elements of visual change that are relevant to the analysis and that serve as the basis for characterizing viewer concern. The determinations of viewer concern presented in the analysis are neither uninformed nor unsupported. The determinations of viewer concern are reasonable and what are expected from affected residents. They are based on several decades of the visual resource specialist's reviewing public comments (including those for the Proposed Project) and attending public workshops, scoping meetings, and hearings on similar transmission line projects. Therefore, no changes to the viewer concern characterizations have been made.

- F3-414 The commenter makes the same assertion for KOP 2 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-415 The commenter makes the same assertion for KOP 3 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-416 The commenter makes the same assertion for KOP 4 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-417 The commenter makes the same assertion for KOP 5 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-418 The commenter makes the same assertion for KOP 6 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-419 The commenter makes the same assertion for KOP 7 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-420 The commenter makes the same assertion for KOP 8 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-421 The commenter makes the same assertion for KOP 9 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-422 The commenter makes the same assertion for KOP 10 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-423 The commenter makes the same assertion for KOP 11 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-424 The commenter asserts that the visual quality determination for KOP 11 would more accurately be characterized as low to moderate because of the highly disturbed immediate foreground and that the level of concern should be moderate.

The disturbed character of the immediate foreground was taken into consideration in the visual quality determination for KOP 11, which is why the visual quality for KOP 11 was rated



low to moderate. The level of concern for the adjacent and nearby residents was rated high for the reasons previously discussed in Response to Comment F3-413. Therefore, no changes are warranted for either the visual quality or viewer concern ratings of KOP 11.

The commenter also asserts that overall viewer exposure should be reduced to moderate from moderate to high because the adjacent apartment complex is internally focused and east side residences have views that are screened by large trees. Some of the views from the east side residences are only partially screened by trees and only during the seasonal period when the trees are in full leaf since the trees are deciduous. However, views to the northeast toward the project and mountains are relatively unobstructed during the seasonal period when the trees are leafless. Furthermore, the proposed Project would be highly visible to motorists entering and exiting the complex as well as pedestrians on North Hathaway Street. It should also be remembered that each KOP is selected to be representative of views (and visual impacts) of a broader area. In this case, the high overall viewer exposure also accounts for the proposed Project views of other nearby residents on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street. Those viewers would also experience moderate to high viewer exposure, as noted in the discussion of Impact VR-8 in Section D.18.4.3 (Phased Build Alternative). Therefore, the viewer exposure and overall visual sensitivity ratings for KOP 11 are considered reasonable and no changes have been made.

- F3-425 The commenter makes the same assertion for KOP 12 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-426 The commenter makes the same assertion for KOP 13 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-427 The commenter makes the same assertion for KOP 14 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-428 The commenter makes the same assertion for KOP 15 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-429 The commenter makes the same assertion for KOP 16 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-430 The commenter makes the same assertion for KOP 17 as for KOP 1. Please see the discussion of KOP 1 in Response to Comment F3-413.
- F3-431 The commenter makes the same assertion for KOP 18 as for KOP 1. Please see the discussion of KOP 1 in Response to Comment F3-413.

The commenter also suggests that the viewer concern discussion be changed to state that travelers on Iowa Street currently see utility infrastructure from KOP 18. As noted in the visual setting for KOP 18 in Section D.18.1.2.7 (Subtransmission), there are no visually prominent or dominant energy or utility facilities on Iowa Street in the immediate vicinity of KOP 18 that would be visible to residents in the Cottage Lane residential development or motorists or pedestrians on Iowa Street adjacent to the residential development. Therefore, the viewer concern rating for KOP 18 is considered reasonable and no change has been made.

- F3-432 The commenter asserts that Mitigation Measure VR-1a is unnecessarily restrictive and requests that the language be modified to exclude the application of MM VR-1a to storage sites for excavated materials. The commenter also requests that the deadline for exemption requests under this mitigation measure be reduced from 60 days prior to the start of construction to 7 days prior to the start of construction.
- Mitigation Measure VR-1a (Screen construction activities from view) has been revised to exclude storage sites for excavated materials. A seven-day exemption request review period is not considered reasonable and would not provide adequate time to accommodate the necessary review by the co-lead agencies. The 60-day review period is retained; however, the agencies always endeavor to respond as soon as possible upon receiving a request, typically resulting in a shorter review period than 60-days.
- F3-433 The commenter requests a revision to Mitigation Measure VR-2a pertaining to vegetation removal and ground disturbance at the foot of each tower within the existing ROW, and compliance with CPUC General Order 95.
- General Order 95 relates to CPUC, not BLM. The request is considered reasonable since SCE will need to comply with ground clearing consistent with General Order 95 and other regulatory requirements regardless of the implementation of Mitigation Measure VR-2a (Minimize vegetation removal and ground disturbance). Therefore, the suggested revision will not affect the adequacy of the measure, and the text of MM VR-2a has been revised accordingly to streamline the measure and remove the unnecessary reference to General Order 95.
- F3-434 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.
- F3-435 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.
- F3-436 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.
- F3-437 The commenter requests that temporary marking agents used to identify underground utilities be exempted from the requirements of Mitigation Measure VR-5a. MM VR-5a (Prohibit construction marking of natural features) refers to the application of paint or permanent, not temporary, marking agents. However, to improve the clarity of this requirement, the requested language change has been incorporated into Mitigation Measure VR-5a in Section D.18.3.3 (Impacts and Mitigation Measures) and in Table D.18-10 (Mitigation Monitoring Program – Visual Resources).
- F3-438 The commenter makes similar assertions to Comment F3-410. The reader is referred to the response to Comment F3-410 above.
- F3-439 The commenter makes a similar assertion to Comment F3-410. The reader is referred to the response to Comment F3-410 above.
- F3-440 The commenter asserts that the analysis presented for KOP 11 overstates the assessments of project dominance view blockage, and overall visual change, while also overstating the factors contributing to overall visual sensitivity.



The assessment of overall visual sensitivity at KOP 11 is accurate and reasonable and has been addressed previously; see Responses to Comments F3-413 and F3-424.

The EIS characterization of the overall visual change that would be experienced by residents in the vicinity of KOP 11 is also reasonable. The natural, angular forms of the mountains visible in the vicinity of KOP 11 are generally unobstructed. The introduction of prominent, vertical steel poles in the foreground of those views would add linear, industrial gray features that do not repeat any of the natural characteristics (form, line, color, or texture) of the background natural landforms. The resulting visual contrast would be Moderate to High as stated in the KOP 11 analysis in Section D.18.3.3 (Visual Resources, Impacts and Mitigation Measures). The color contrast between the lighter gray foreground poles and the darker background landform colors would exacerbate structural prominence and in combination with the curvilinear forms of the conductors, would contribute to the Moderate to High view blockage of the background mountains. This assessment presented in the DEIR/EIS is a reasonable characterization of the proposed Project effects that would be experienced in vicinity of KOP 11, and no change has been made to those conclusions.

F3-441 The commenter asserts that the simulation of the subtransmission line proposed along Iowa Street and presented in Figure D.18-25B illustrates the wrong structure type and as a result the language describing the existing setting and visual impacts should be changed. At the time the simulation and analysis were undertaken, the structure design used in the simulation followed the guidance of SCE as to representative facilities that could be used as a model. However, with this new guidance provided by SCE, the simulation presented in Figure D.18-25 has been revised. Based on SCE's initial description, the Draft EIR/EIS Project Description stated that Lightweight Steel (LWS) Poles were to be used for this portion of the subtransmission route, though it is understood that the poles could be either LWS or wood. The revised simulation shows LWS poles. However, as stated in the EIS text for Section D.18.3.3 under KOP 18 (Iowa Street), there are presently no visually prominent or dominant energy or utility facilities along this portion of Iowa Street adjacent to the Cottage Lane residential subdivision. As a result, the visual impact would essentially be the same regardless of the structure composition and the analysis and conclusions are considered accurate for either structure type. Therefore, the language in the EIS has not been changed.

F3-442 The commenter makes the same assertions as contained in Comment F1-24. The reader is referred to the Response to Comment F1-24.

F3-443 The commenter makes the same assertions as contained in Comment F1-24. The reader is referred to the Response to Comment F1-24.

F3-444 The commenter requests that the EIS clarify that mitigation measures for connected actions will not be imposed on the West of Devers Upgrade Project.

See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-445 The commenter makes a similar assertion to Comment F3-438. The reader is referred to the Response to Comment F3-438 above.

F3-446 The commenter requests that the EIS clarify that mitigation measures for connected actions will not be imposed on the West of Devers project.

See Response to Comment F3-102 with regard to mitigation for connected actions.

- F3-447 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-448 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-449 The commenter makes a similar assertion to Comment F3-438. The reader is referred to the response to Comment F3-438 above.
- F3-450 The commenter makes a similar assertion to Comment F3-438. The reader is referred to the response to Comment F3-438 above.
- The commenter also asserts that the visual impacts in the vicinity of KOP 11 would be less than significant and should be removed from the EIS. The visual analysis of KOP 11 is addressed in Responses to Comments F3-424 and F3-440. See those responses for discussions as to why the KOP 11 analysis is accurate and appropriate to retain in the EIS.
- F3-451 The commenter asserts that Mitigation Measure VR-1a is unnecessarily restrictive and requests that the language be modified to exclude the application of MM VR-1a to storage sites for excavated materials. The commenter also requests that the deadline for exemption requests under this mitigation measure be reduced from 60 days prior to the start of construction to 7 days prior to the start of construction.
- The commenter makes the same assertions and requests in Comment F3-432. Please see Response to Comment F3-432.
- F3-452 The commenter requests a revision to Mitigation Measure VR-2a pertaining to vegetation removal and ground disturbance at the foot of each tower within the existing ROW, and compliance with CPUC General Order 95.
- The commenter makes the same request in Comment F3-433. Please see the discussion in Response to Comment F3-433.
- The commenter also makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.
- F3-453 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.
- F3-454 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.
- F3-455 The commenter requests that temporary marking agents used to identify underground utilities be exempted from the requirements of Mitigation Measure VR-5a. The commenter makes the same request in Comment F3-437. Please see Response to Comment F3-437.
- F3-456 The commenter asserts that Mitigation Measure VR-8a (Minimize visual contrast in project design) presented in Section D.18.3.3 (Impacts and Mitigation Measures) should not be applied across the entirety of the project and in fact should be eliminated because CEQA does not require the application of mitigation measures to less than significant impacts. The commenter makes the same assertion in Comment F3-442. Please see Response to Comment F1-24 and F3-442. Under NEPA, mitigation measures must be considered even for impacts that by themselves would not be considered significant.

- F3-457      The commenter asserts that Mitigation Measure VR-9a (Treat structure surfaces) presented in Section D.18.3.3 (Impacts and Mitigation Measures) is not needed because the proposed Project structures and conductors would weather to a dull gray finish, and that similar to MM VR-8a discussed above, MM VR-9a should be removed from the EIS. The commenter makes the same assertion in Comment F3-443. Please see Response to Comment F3-443.

## Comment Set F3: Southern California Edison Company (cont.)

### Section D.19 Water Resources and Hydrology

#### Page D.19-15

##### DEIR/DEIS Text:

Under the heading TMDL Program, the paragraph states:

The California TMDL Program evaluates the condition of surface waters and sets limits on the amount of pollution that the water can be exposed to without adversely affecting the beneficial uses of those waters. The RWQCBs identify waters that are not attaining standards, and develop total maximum daily loads to account for all sources of the pollutants that caused the water to not attain standards. TMDL levels are established to achieve the applicable water quality standards. When the TMDL is established as a standard, a program must be designed to implement the TMDL. TMDLs developed by RWQCBs are Regional Basin Plan amendments and include implementation provisions.

##### SCE Comment:

Please make the following revisions:

The California TMDL Program evaluates the condition of surface waters and sets limits on the amount of pollution that the water can be exposed to without adversely affecting the beneficial uses of those waters. The RWQCBs are required to identify waters ~~that are not attaining standards~~ where beneficial uses are impaired, establish priority rankings for water segments on the lists, and develop action plans, or TMDLs, to improve water quality, and develop total maximum daily loads to account for all sources of the pollutants that caused the water to not attain standards. TMDL levels are established to achieve the applicable water quality standards. When the TMDL is established as a standard, a program must be designed to implement the TMDL. As TMDLs are developed and established as a standard, they are added to the ~~by RWQCBs are~~ Water Quality Control Plan through Regional Basin Plan amendments and include implementation provisions.

F3-458

#### Page D.19-15

##### DEIR/DEIS Text:

The Porter Cologne Water Quality Control Act of 1967, Water Code Section 13000 et seq., requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for the project area are contained in the Water Quality Control Plan for the Santa Ana River Basin (CRWQCB, 1995) and the Water Quality Control Plan Colorado River Basin – Region 7 (CRWQCB, 2005). Constraints in the water quality control plans relative to the Proposed Project relate primarily to the avoidance of altering the sediment discharge rate of surface waters, and the avoidance of introducing toxic pollutants to the water resource. A primary focus of water quality control plans is to protect designated beneficial uses of waters. In addition, anyone proposing to discharge waste that could affect the quality of the waters of the state must make a report of the waste discharge to the Regional Water Board or State Water Board as appropriate, in compliance with Porter-Cologne.

##### SCE Comment:

Please make the following revisions:

The Porter Cologne Water Quality Control Act of 1967, Water Code Section 13000 et seq., requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for the project area are contained in the Water Quality Control Plan for the Santa Ana River Basin-Region 4 (CRWQCB, ~~1995~~2014) and the Water Quality Control Plan Colorado River Basin – Region 7 (CRWQCB, ~~2005~~2014). Constraints in the water quality control plans relative to the Proposed Project relate primarily to the avoidance of altering the sediment discharge rate of surface waters, and the avoidance of introducing toxic pollutants to the water resource. A primary focus of water quality control plans is to protect designated beneficial uses of waters. In addition, anyone proposing to discharge waste that could affect the quality of the waters of the state must make a report of the waste discharge to the Regional Water Quality Control Board or State Water Resources Control Board as appropriate, in compliance with Porter-Cologne.

F3-459

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.19-20**

**DEIR/DEIS Text:**

Under the header *Impact WR-2* in the fifth paragraph it states:

As described in Section B.3.1.2 (Section B, Project Description), SCE would develop and adhere to a SWPPP in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activity.

**SCE Comment:**

Please make the following revisions:

As described in Section B.3.1.2 (Section B, Project Description), SCE would develop and adhere to a the SWPPPs in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activities and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land .

F3-460

**Page D.19-20**

**DEIR/DEIS Text:**

Access roads would be constructed in watercourses, but none of the proposed structures would be located directly within major watercourses listed in Table D.19-1. APM HYDRO-1 requires maintaining the existing flow pattern where possible. Mitigation Measure WR-2a (Implement an Erosion Control Plan

**SCE Comment:**

Please make the following revisions:

Major Streams and watercourses crossed by the project route are identified in Table D.19-1. Figures D.19-1a through D.19-1i (presented at the end of this section) show the locations of most watercourses on a topographic base map. Note, Table D.19-1 does not include all surface water features within the Proposed Project; SCE will prepare a Jurisdictional Delineation (JD) Report of the project's impact areas after completing final design (PEA, page 4.4-112) to identify and quantify all site-specific project impacts to jurisdictional waters.

Access roads would be constructed in watercourses, ~~but none of the proposed and some~~ structures would may be located directly within major watercourses listed in Table D.19-1. APM HYDRO-1 requires maintaining the existing flow pattern where possible. Mitigation Measure WR-2a (Implement an Erosion Control Plan

F3-461



Comment Set F3: Southern California Edison Company (cont.)

Page D.19-21

DEIR/DEIS Text:

**WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality permits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction. The Erosion Control Plan may be part of the same document as the Stormwater Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures. The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improve access and spur roads.
- The location of all streams and drainage structures that would be directly affected by soil-disturbing activities (such as stream crossings or public storm drains by the right-of-way and access roads)
- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the Regional Water Quality Control Board shall be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of all BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.
- A proposed schedule for the implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.

SCE Comment:

The Erosion Control Plan will be incorporated into the Storm Water Pollution Prevention Plan, which will be written and implemented in compliance with the applicable Federal and California Construction General Permits for Storm Water. The SWPPP will be kept onsite and will be readily available on request.

**WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality permits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction. The Erosion Control Plan may be part of the same document as the Storm Water Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures. The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improve access and spur roads
- BMPs will be included to protect and drainage structures (such as public storm drains) down stream of soil disturbance activities.
- The location of all streams and drainage structures that would be directly affected by soil-disturbing activities (such as stream crossings or public storm drains by the right-of-way and access roads)
- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the Regional Water Quality Control Board shall be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of all BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.
- A proposed schedule for the Specifications for implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.
- Proposed schedule for inspection of erosion control/SW PPP measures and schedule for corrective actions/repairs, if required. Erosion control/NSW PPP inspection reports shall be kept in the SWPPP provided to the CPUC-EM and be made available upon request.

F3-462

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.19-21**

**DEIR/DEIS Text:**

Under the header WR-2a in the paragraph under the bulleted list it states:

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion. A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.

**SCE Comment:**

Please make the following revisions:

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion, and documented during inspections. Inspections and monitoring will be performed in compliance with the Federal and California Construction General Permits. A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM. The inspection reports will be maintained and kept in their respective SWPPP and will be kept on site as required by the Federal and State Construction General Permits. Additionally, an Annual Report will be filed for each reporting period in compliance with both the Federal and California Construction General Permit reporting requirements.

**F3-463**

**Page D.19-21**

**DEIR/DEIS Text:**

Under the header WR-2a in the paragraph under the bulleted list it states:

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion. A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.

**SCE Comment:**

Please make the following revisions:

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion, and documented during inspections. Inspections and monitoring will be performed in compliance with the federal and California Construction General Permits. A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM. The inspection reports will be maintained and kept in their respective SWPPP and will be kept on site as required by the federal and State Construction General Permits. Additionally, an Annual Report will be filed for each reporting period in compliance with both the federal and California Construction General Permit reporting requirements.

**F3-464**



Comment Set F3: Southern California Edison Company (cont.)

Page D.19-21

DEIR/DEIS Text:

Under the header WR-2a in the last paragraph it states:

SCE shall submit to the CPUC and BLM evidence of possession of all required permits before engaging in soil-disturbing construction/demolition activities, before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water. Such permits may include, but are not limited to, a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a CWA Section 402 NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and/or a CWA Section 401 certification from the applicable RWQCBs.

SCE Comment:

Please make the following revisions:

SCE shall submit to the CPUC and BLM evidence of possession of all applicable required permits for the representative land disturbance area prior to before engaging in soil-disturbing construction/demolition activities, before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water. Such permits may include, but are not limited to, a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a Clean Water Act (CWA) Section 402 NPDES California General Permits for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs) and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land, and/or a CWA Section 401 certification from the applicable RWQCBs.

Prior to ground disturbance in waters (e.g., maintenance grading or constructing a crossing at flowing or ponded water, etc.), SCE will obtain a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, and a CWA Section 401 certification from the SWRCB.

Page D.19-23

DEIR/DEIS Text:

Onsite damages related to channel erosion and vertical scour during a flood could be prevented by design of footings and burial depth to account for erosion and scour. The final design analysis has not been completed, and it is not known at this time if footings and burial depths would take erosion and scour into account.

Mitigation Measure WR-3a (Implement flood, erosion, and scour protection for aboveground and belowground improvements) is recommended in order to reduce the potential for damage and interruption of power and communication services due to erosion and scour.

***Mitigation Measure for Impact WR-3: The project would cause flood damage***

WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improvements. SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures and other above-ground features, as well as new underground conduits. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer.

SCE shall provide the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan)).

SCE Comment:

SCE's standard engineering design practices incorporate analysis of potential scour impacts to determine foundation depth. Therefore, please make the following revisions:

F3-465

F3-466

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Onsite damages related to channel erosion and vertical scour during a flood could be prevented by design of footings and burial depth to account for erosion and scour. The final design analysis has not been completed, ~~and it is not known at this time however,~~ if footings and burial depths would take erosion and scour into account per SCE's standard engineering design practices. Mitigation Measure WR-3a (Implement flood, erosion, and scour protection for aboveground and belowground improvements) is recommended in order to reduce the potential for damage and interruption of power and communication services due to erosion and scour.

***Mitigation Measure for Impact WR-3: The project would cause flood damage***

**WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improvements.** SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures with a foundation ~~and other above-ground features~~, as well as new underground conduits located within mapped FEMA 100-year flood zone boundaries. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer.

SCE shall provide appropriate documentation that indicates incorporation of scour depths into the foundation design, ~~the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan)).~~

**F3-466 cont.**

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-24

DEIR/DEIS Text:

F3-467

Under the header WR-4 in the fourth paragraph it states:

Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would require development of and adherence to erosion-control and hazardous material plans during construction. Development and adherence to an SWPPP in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activity, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards, would require best management practices to prevent and control erosion and siltation during construction, prevent, contain and mitigate accidental spills during construction, and address treatment and disposal of any groundwater to prevent violation of water quality objectives or damaging beneficial uses. Compliance with Sections 401 and 404 of the Clean Water Act would also minimize this impact. Mitigation Measure HH-2a (Prepare a hazardous materials and waste management plan), described in Section D.10 Hazards and Hazardous Materials, would further ensure against potential surface and groundwater contamination.

SCE Comment:

Please make the following revisions:

Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would require development of and adherence to erosion control and hazardous material plans during construction. Development and adherence to ~~an~~the SWPPPs in conformance with the applicable (California or Federal) General Permit for Discharges of Storm Water Associated with Construction Activities, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards, would require best management practices to prevent and control erosion and siltation during construction, prevent, contain and mitigate accidental spills during construction, and address treatment (if required) and disposal of any dewatered groundwater to prevent violation of water quality objectives or damaging beneficial uses. Compliance with Sections 401 and 404 of the Clean Water Act would also minimize this impact. Mitigation Measure HH-2a (Prepare a hazardous materials and waste management plan), described in Section D.10 Hazards and Hazardous Materials, would further ensure against potential surface and groundwater contamination.

Page D.19-29 through 30

DEIR/DEIS Text:

F3-468

*Impact WR-2: The project would cause erosion and siltation (Class II)*

Construction and operation of the connected action projects would involve ground disturbance that would result in a significant impact related to accelerated erosion and sedimentation. With implementation of mitigation to control erosion, this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.19-30

DEIR/DEIS Text:

*Impact WR-3: The project would cause flood damage (Class II)*

**Connected Actions.** For connected solar projects, construction and operation of the connected action projects would involve changes to the amount of impervious surface in the area as well as placement of structures in floodplains or areas that would experience shallow flooding following a precipitation event. These activities could result in a significant impact related to flood damage. With implementation of mitigation, this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.19-30

DEIR/DEIS Text:

Under the header *Impact WR-4* in the first paragraph it states:

Project construction would disturb soil and result in erosion and lowered water quality through increased turbidity and sediment deposition into local streams. Accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. Mitigation Measure WR-2a requires a specific erosion control plan. Development and adherence to an SWPPP in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activity, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards, requires best management practices to prevent and control erosion and siltation, contain and mitigate accidental spills during construction, and address treatment and disposal of any groundwater. Clean Water Act Sections 401 and 404 would provide additional water quality protection. With implementation of mitigation, APM, and existing regulations, Impact WR-4 would be less than significant (Class II).

SCE Comment:

Please make the following revisions:

Project construction would disturb soil and result in erosion and lowered water quality through increased turbidity and sediment deposition into local streams. Accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. Mitigation Measure WR-2a requires a specific erosion control plan. Development and adherence to ~~an~~the SWPPPs in conformance with the applicable ~~(California or federal)~~ General Permit for Discharges of Storm Water Associated with Construction Activities, ~~as~~ administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards, requires best management practices to prevent and control erosion and siltation, contain and mitigate accidental spills during construction, and address treatment ~~(if required)~~ and disposal of ~~any dewatered~~ groundwater. Clean Water Act Sections 401 and 404 would provide additional water quality protection. With implementation of mitigation, APM, and existing regulations, Impact WR-4 would be less than significant (Class II).

F3-469

F3-470

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-30

DEIR/DEIS Text:

*Impact WR-4: The project would degrade water quality, or violate a water quality standard or waste discharge requirement (Class II)*

Construction and operation of the connected action projects would involve ground disturbance that could lead to increased erosion and sedimentation that could violate water quality standards. Also, accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. These activities would result in a significant impact related to water quality degradation. With implementation of mitigation, this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-471

Page D.19-31

DEIR/DEIS Text:

Under the header *Impact WR-2* in the last sentence it states:

As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity.

SCE Comment:

Please make the following revisions:

As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable a-National Pollution Discharge Elimination System (NPDES) General Permits for Storm Water Discharges Associated with Construction Activities.

F3-472

Page D.19-34

DEIR/DEIS Text:

Under the header *Impact WR-2* in the second paragraph in the third sentence it states:

As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity.

SCE Comment:

Please make the following revisions:

As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable a-National Pollution Discharge Elimination System (NPDES) General Permits for Storm Water Discharges Associated with Construction Activities.

F3-473



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.19-35 through 36**

**DEIR/DEIS Text:**

**D.19.4.3 Phased Build Alternative**

Impact WR-1: The project would deplete groundwater supplies or interfere with groundwater recharge

Impact WR-2: The project would cause erosion and siltation

Impact WR-3: The project would cause flood damage

Impact WR-4: The project would degrade water quality, or violate a water quality standard or waste discharge requirement

**SCE Comment:**

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional waters and hydrology impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

F3-474

**Page D.19-36**

**DEIR/DEIS Text:**

Under the header *Impact WR-2* in the first paragraph in the second sentence it states:

As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity."

**SCE Comment:**

Please make the following revisions:

As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable a-National Pollution Discharge Elimination System (NPDES) General Permits for Storm Water Discharges Associated with Construction Activities.

F3-475

### Comment Set F3: Southern California Edison Company (cont.)

Page D.19-40

#### DEIR/DEIS Text:

Within Table D.19-4, under WR-2a it states:

**WR-2a: Implement an Erosion Control Plan and demonstrate compliance with water quality permits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction. The Erosion Control Plan may be part of the same document as the Stormwater Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures. The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads
- The location of all streams and drainage structures that would be directly affected by soil-disturbing activities (such as stream crossings or public storm drains by the right-of-way and access roads)
- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the Regional Water Quality Control Board shall be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of all BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.
- A proposed schedule for the implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.
- Proposed schedule for inspection of erosion control/SWPPP measures and schedule for corrective actions/repairs, if required. Erosion control/SWPPP inspection reports shall be provided to the CPUC EM.

#### SCE Comment:

The Erosion Control Plan will be incorporated into the Storm Water Pollution Prevention Plan, which will be written and implemented in compliance with the applicable Federal and California Construction General Permits for Storm Water. The SWPPP will be kept onsite and will be readily available on request.

**WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality permits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM ~~for approval at least 60 days prior to construction.~~ The Erosion Control Plan may be part of the same document as the Storm ~~Water~~ Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion ~~through revegetation or construction of permanent erosion control structures.~~ The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads
- ~~BMPs will be included to protect drainage structures (such as public storm drains) down stream of soil disturbance activities.~~
- The location of all streams ~~and drainage structures~~ that would be directly affected by soil-disturbing activities (such as stream crossings ~~or public storm drains~~ by the right-of-way and access roads)
- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and ~~evidence of approval by the Regional Water Quality Control Board~~ shall be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of ~~all~~ BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.

F3-476



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

- ~~A proposed schedule for the Specifications for implementation~~ and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.
- Proposed schedule for inspection of erosion control/SW PPP measures and schedule for corrective actions/repairs, if required. Erosion control/SWPPP inspection reports shall be kept in the SWPPP~~provided to the CPUC and be made available upon request.~~

F3-476 cont.

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-40

DEIR/DEIS Text:

Monitoring / Reporting Action	CPUC/BLM monitor to verify that Erosion Control Plan meets defined requirements, and that all required permits have been obtained prior to the start of construction in each segment.
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F3-477

SCE Comment:

Based on the edits to mitigation measure WR-2a, please make the following revisions to the Monitoring/Reporting Action:

Monitoring / Reporting Action	<del>CPUC/BLM monitor to verify that Erosion Control Plan applicable SWPPP (includes Erosion Control Plan) has been prepared and permitted prior to the start of soil disturbing activities of the applicable construction project components. The SWPPPs will be prepared in compliance with the applicable Federal and California Construction General Permit requirements, meets defined requirements, and that all required permits have been obtained prior to the start of construction in each segment.</del>
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Page D.19-40

DEIR/DEIS Text:

SCE shall submit to the CPUC and BLM evidence of possession of all required permits before engaging in soil-disturbing construction/demolition activities, before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water. Such permits may include, but are not limited to, a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a CWA Section 402 NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and/or a CWA Section 401 certification from the applicable RWQCBs.

SCE Comment:

Please make the following revisions:

SCE shall submit to the CPUC and BLM evidence of possession of all applicable required permits for the representative land disturbance area prior to before engaging in soil-disturbing construction/demolition activities. ~~before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water.~~ Such permits may include, but are not limited to, ~~a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a Clean Water Act (CWA) Section 402 NPDES California General Permits for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs) and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land,~~ and/or a CWA Section 401 certification from the applicable RWQCBs.  
Prior to ground disturbance in waters (e.g., maintenance grading or constructing a crossing at flowing or ponded water, etc.), SCE will obtain a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, and a CWA Section 401 certification from the SWRCB.

F3-478

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.19-41

DEIR/DEIS Text:

**WR-3a: Implement flood, erosion, and scour protection for aboveground and belowground improvements.** SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures and other above-ground features, as well as new underground conduits. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer.

SCE shall provide the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan)).

SCE Comment:

Based on the edits provided in previous comments, please make the following revision:

**WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improvements.** SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures with a foundation and other above-ground features, as well as new underground conduits located within mapped FEMA 100-year flood zone boundaries. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer. SCE shall provide appropriate documentation that indicates incorporation of scour depths into the foundation design, the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan)).

F3-479

Page D.19-42

DEIR/DEIS Text:

\_\_\_\_\_. 1995. Water Quality Control Plan Santa Ana River Basin.

SCE Comment:

Please make the following revisions to the third reference:

RWQCBSAR (California Regional Water Quality Control Board Santa Ana River Region). 2014. 1995-Water Quality Control Plan Santa Ana River Basin.

F3-480

Page D.19-42

DEIR/DEIS Text:

References

SCE Comment:

Please add the following missing reference:

Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land

F3-481

## Responses to Comment Set F3 – Section D.19 Water Resources and Hydrology

- F3-458 The commenter asks for text changes describing TMDLs. The text changes would remove the reference to RWQCBs identifying waters that do not attain standards, but otherwise the changes clarify but would not substantially change the intended meaning. The original text is generally taken from the RWQCB and is considered adequate. For clarification, a minor text change is made in Section D.19.2.2 (Water Resources and Hydrology, Applicable Regulations, Plans, and Standards, State).
- F3-459 The commenter asks for editorial text changes in Section D.19.2.2 (Water Resources and Hydrology) describing the Porter Cologne Water Quality Control Act. The changes relate to the dates of the RWQCB basin plans. Text has been modified in Section D.19.2.2 in the discussion of the Porter-Cologne Act for clarification.
- F3-460 The commenter requests mention of Tribal Land in Impact WR-2 related to erosion and siltation. The text change has been made to include Tribal Lands in the discussion of Impact WR-2 (The project would cause erosion and siltation) in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation). A similar clarification has been made in Section D.19.2.1, under the discussion of the Federal Clean Water Act.
- F3-461 The commenter asks to include in Table D.19-1 mention of a jurisdictional delineation to be prepared by SCE. Other minor text changes are requested in the discussion of Impact WR-2 (The project would cause erosion and siltation).

In response, Table D.19-1 (Surface Water Features Crossed by the Proposed Project) has been modified to add a footnote stating that SCE prepared a Drainage Assessment (described in EIS Section D.4.1), as preliminary information related to potential jurisdictional waters under Section 404 of the Clean Water Act, to support project design. After final design, SCE will prepare a Jurisdictional Delineation Report of the project's areas of impact.

This discussion of Impact WR-2 in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation) has been modified as suggested to indicate the impact potential that "some" structures "may" be located directly within watercourses listed in Table D.19-1. This minor modification would not affect the impact analysis, which concludes that with implementation of mitigation, APMs, and compliance with existing regulations, erosion impacts related to disturbance of drainage patterns are expected to be minimal.

- F3-462 The commenter requests text changes to Mitigation Measure WR-2a (Implement an Erosion Control Plan) in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation). The suggested text changes would eliminate the requirement to submit the plan 60-days prior to construction, eliminate the requirement for identifying the location of drainage structures and storm drains in the erosion control plan, and eliminate the requirement for RWQCB approval of soil cement. Otherwise, the text changes are clarifications that would not substantially alter the intended meaning of the text.

Some text changes are made for clarification and if they did not alter the meaning or intent of Mitigation Measure WR-2a in Section D.19.3.3. Other changes are not made. No reason was offered for why the proposed changes should be made. The requirement to submit the plan "for approval at least 60 days prior to construction" remains. BLM requires adequate time for review and approval. The request to strike drainage structures and public storm drains from the features affected by soil-disturbing activities is not acceptable, as these are

features that could be affected. The requirement to provide evidence of approval by the Regional Water Quality Control Board of the use of soil cement, if proposed, remains, as does the provision requiring submission of inspection reports to the CPUC EM remains.

- F3-463 The commenter requests text changes to Mitigation Measure WR-2a (Implement an Erosion Control Plan) as a follow on to Comment F3-462. The text change clarifies the protocol for inspection reports.

Clarifying text changes have been made in the first paragraph after the bullet list in Mitigation Measure WR-2a, in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation). These do not change the meaning or intent of the mitigation measure.

- F3-464 This comment is identical to Comment F3-463.

- F3-465 The commenter requests text changes to the third and fourth paragraphs after the bullet list in Mitigation Measure WR-2a. The text changes clarify that California Streambed Alteration Agreements, and Federal Section 401 and 404 permits are required for disturbance in riparian areas, but not necessarily for disturbance outside of watercourses.

The requested text changes have been made to the third and fourth paragraphs after the bullet list in Mitigation Measure WR-2a in Section D.19.3.3. These do not change the meaning or intent of the mitigation measure.

- F3-466 The commenter requests text changes to Mitigation Measure WR-3a (Implement flood, erosion, and scour protection) in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation). The text change refers to SCE's standard engineering practices, limit scour protection to structures within FEMA floodplains, and would eliminate the requirement for providing BLM the determinations and recommended corrective actions to be made.

Delineated FEMA floodplains represent only part of the potential for scour-related and erosion-related damage to structures. The intent of this mitigation measure is to ensure that an experienced engineer makes a determination of which structures are likely at risk and to design corrective measures to address scour and erosion risks wherever they may occur, not just those in FEMA-designated floodplains. SCE standard engineering practices may be used, if these are adequate to cover the intent of this mitigation measure. Text changes have been made to Mitigation Measure WR-3a in Section D.19.3.3 to further clarify the intent of the mitigation measure.

- F3-467 The commenter requests clarifying text changes to the discussion of Impact WR-4 (The project would degrade water quality, or violate a water quality standard or waste discharge requirement) in Section D.19.3.3. The changes are clarifications that would not substantially change discussion in the text. The requested text changes have been made in Section D.19.3.3, in the fourth paragraph under Impact WR-4.

- F3-468 The commenter requests clarification that mitigation measures for connected actions are not to be imposed on SCE, nor implemented prior to construction of the West of Devers project. See Response to Comment F3-102 with regard to mitigation for connected actions.

- F3-469 The commenter requests clarification that mitigation measures for connected actions are not to be imposed on SCE, nor implemented prior to construction of the West of Devers project. See Response to Comment F3-102 with regard to mitigation for connected actions.



- F3-470 The commenter requests text changes to Impact WR-4 (The project would degrade water quality, or violate a water quality standard or waste discharge requirement) in Draft EIR/EIS Section D.19.3.5 (CEQA Significance Determination for Proposed Project and Connected Actions). The text changes are the same as those requested in Comment F3-467. This relates to CEQA, not NEPA. However, the requested text changes have been made in Section D.19.3.3. See Response to Comment F3-467.
- F3-471 The commenter requests clarification that mitigation measures for connected actions are not to be imposed on SCE, nor implemented prior to construction of the West of Devers project. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-472 The commenter requests text changes to the discussion of Impact WR-2 (The project would degrade water quality, or violate a water quality standard or waste discharge requirement) in the Tower Relocation Alternative (Section D.19.4.1). The changes are text clarifications that would not substantially change the discussion. The text changes have been made in Section D.19.4.1, eliminating NPDES being spelled out and making text plural.
- F3-473 This comment is the same as Comment F3-472, but applied to the Iowa Street 66 kV Underground Alternative (Section D.19.4.2). The changes are text clarifications that would not substantially change the intended meaning. The requested text changes have been made in Section D.19.4.2.
- F3-474 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-475 This comment is the same as Comment F3-472, but applied to the Iowa Street 66 kV Underground Alternative (Section D.19.4.3). The changes are text clarifications that would not substantially change the intended meaning. The requested text changes have been made in Section D.19.4.3.
- F3-476 The commenter requests text changes to Mitigation Measure WR-2a in Table D.19-4. This comment is identical to Comment F3-462, applied to the repeat of Mitigation Measure WR-2a in Table D.19-4. The response is the same as for Comment F3-462. Text changes have been made to Table D.19-4.
- F3-477 The commenter requests text changes to the Monitoring/Reporting Action for Mitigation Measure WR-2a in Table D.19-4. The changes would make the reporting action consistent with the changes to Mitigation Measure WR-2a described in Comments F3-462 and F3-476. The requested text changes have been made to Table D.19-4.
- F3-478 The commenter requests text changes to Mitigation Measure WR-2a in Table D.19-4. This comment is identical to Comment F3-465, applied to the repeat of Mitigation Measure WR-2a in Table D.19-4. The response is the same as for Comment F3-465. Text changes have been made to Table D.19-4.
- F3-479 The commenter requests text changes to Mitigation Measure WR-3a in Table D.19-4. This comment is identical to Comment F3-466, applied to the repeat of Mitigation Measure WR-3a in Table D.19-4. The response is the same as for Comment F3-466. Text changes have been made to Table D.19-4 to clarify the intent of Mitigation Measure WR-3a.

- F3-480 The commenter requests the reference to the Santa Ana River Basin Water Quality Control Plan in the References section be updated from 1995 to 2014. The reference to the Santa Ana River Basin Water Quality Control Plan in the D.19.7 References section has been updated.
- F3-481 The commenter requests that a reference be added for the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land. A text change has been made in Section D.19.2.1 of the report to clarify that the EPA administers NPDES permits on Tribal Land. The comment did not provide a specific reference citation that could be identified.



## Comment Set F3: Southern California Edison Company (cont.)

### Section D.20 Wildland Fire

#### Page D.20-1

##### DEIR/DEIS Text:

The presence of a transmission line can hinder initial attack and containment in the event of a fire in the vicinity of the line. The presence of structures and conductors can pose risks to firefighters, both on the ground and in the air. Where overhead power lines are present, aerial and ground attacks are restricted. Aerial operations are complicated by the risk of aircraft and/or water buckets colliding with structures or conductors during smoky, reduced-visibility conditions. Conditions are especially hazardous when transmission lines are placed on ridge tops, reducing the proximity of fire retardant and water drop deliveries that aerial firefighting crews can achieve safely. For these reasons, pilots are kept apprised of the location of transmission lines. Firefighters on the ground can be put at risk if charged particles in heavy smoke create a short circuit or arc between an energized line and the earth, a person, or firefighting equipment. For this reason, firefighting protocols require crews to maintain certain distances from energized lines. Fire managers coordinate with utilities on shutting down lines as needed. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.

##### SCE Comment:

To acknowledge beneficial aspects of utility facilities, please make the following revisions:

The presence of a transmission line can hinder initial attack and containment in the event of a fire in the vicinity of the line. The presence of structures and conductors can pose risks to firefighters, both on the ground and in the air. Where overhead power lines are present, aerial and ground attacks are restricted. Aerial operations are complicated by the risk of aircraft and/or water buckets colliding with structures or conductors during smoky, reduced-visibility conditions. Conditions are especially hazardous when transmission lines are placed on ridge tops, reducing the proximity of fire retardant and water drop deliveries that aerial firefighting crews can achieve safely. For these reasons, pilots are kept apprised of the location of transmission lines. Firefighters on the ground can be put at risk if charged particles in heavy smoke create a short circuit or arc between an energized line and the earth, a person, or firefighting equipment. For this reason, firefighting protocols require crews to maintain certain distances from energized lines. Fire managers coordinate with utilities on shutting down lines as needed. Conversely, utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.

F3-482

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.20-1

DEIR/DEIS Text:

MITIGATION MEASURE

WF-1a: Prepare and implement a Fire Management Plan. A Project-specific fire prevention plan for both construction and operation of the project shall be prepared by SCE and submitted to for review prior to initiation of construction. The draft copy of this Plan is to be provided to each fire agency at least 90 days before the start of any construction activities in areas designated as Very High or High Fire Hazard Severity Zones. Plan reviewers shall include CPUC, BLM, CAL FIRE, San Bernardino and Riverside Counties, and local municipal fire agencies with jurisdiction over areas where the project is located. Comments on the Plan shall be provided by SCE to all other participants, and SCE shall resolve each comment in consultation with CAL FIRE, BLM, and the Morongo Fire Department, as appropriate. The final Plan shall be approved by these agencies at least 30 days prior to the initiation of construction activities. SCE shall fully implement the Plan during all construction and maintenance activities.

A project Fire Marshal or similar qualified position shall be established by SCE to enforce all provisions of the Fire Management Plan as well as perform other duties related to fire detection, prevention, and suppression for the project. SCE shall monitor construction activities to ensure implementation and effectiveness of the plan.

The Plan shall include at a minimum SCE's Specification E-2005-104 (Transmission line Project Fire Plan), including any updates and amendments, and other requirements specified below.

The Plan should recognize and prepare for the high probability that fast moving, wind driven wildfires will burn adjacent or through the Proposed Project with some regularity as the result of severe fire weather conditions, flash fuels such as provided by perennial grasslands, and abundant ignition sources. Wind driven fires can quickly overcome operational and maintenance crews, placing their health and safety at risk.

The Plan shall cover:

- The purpose and applicability of the plan;
- Responsibilities and duties;
- Preparedness training and drills;
- Procedures for fire reporting, response, and prevention that include:
  - identification of daily site-specific risk conditions
  - the tools and equipment needed on vehicles and to be on hand at sites
  - reiteration of fire prevention and safety considerations to ringtail board meetings
  - daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity,
- Coordination procedures with BLM and San Bernardino and Riverside County fire officials
- Crew training, including fire safety practices and restrictions,
- Method for verification that Plan protocols and requirements are being followed.

SCE Comment:

The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination as compared to the benefit of said coordination. Please make the following revisions:

MITIGATION MEASURE

WF-1a: Prepare and implement a Fire Management Plan. A Project-specific fire prevention plan for both construction and operation of the project shall be prepared by SCE and submitted to for review to the CPUC and BLM prior to initiation of construction. The draft copy of this Plan is to be provided to each fire agency at least 90 days before the start of any construction activities in areas designated as Very High or High Fire Hazard Severity Zones. Plan reviewers shall include CPUC, BLM, CAL FIRE, San Bernardino and Riverside Counties, and local municipal fire agencies with jurisdiction over areas where the project is located. Comments on the Plan shall be provided by SCE to all other participants, and SCE shall resolve each comment in consultation with CAL FIRE, BLM, and the Morongo Fire Department, as appropriate. The final Plan shall be approved by these agencies at least 30 days prior to the initiation of construction activities. SCE shall fully implement the Plan during all construction and maintenance activities.

F3-483

**Comment Set F3: Southern California Edison Company (cont.)**

A project Fire Marshal or similar qualified position shall be established by SCE to enforce all provisions of the Fire Management Plan as well as perform other duties related to fire detection, prevention, and suppression for the project. SCE shall monitor construction activities to ensure implementation and effectiveness of the plan.

The Plan shall include at a minimum SCE's Specification E-2005-104 (Transmission line Project Fire Plan), including any updates and amendments, and other requirements specified below.

The plan should recognize and prepare for the high probability that fast moving, wind driven wildfires will burn adjacent or through the Proposed Project with some regularity as the result of severe fire weather conditions, flash fuels such as provided by perennial grasslands, and abundant ignition sources. Wind driven fires can quickly overcome operational and maintenance crews, placing their health and safety at risk.

The Plan shall cover:

- The purpose and applicability of the plan;
- Responsibilities and duties;
- Preparedness training and drills;
- Procedures for fire reporting, response, and prevention that include:
  - identification of daily site-specific risk conditions
  - the tools and equipment needed on vehicles and to be on hand at sites
  - reiteration of fire prevention and safety considerations to ringtail board meetings
  - daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity,
- Coordination procedures with BLM and San Bernardino and Riverside County fire officials
- Crew training, including fire safety practices and restrictions,
- Method for verification that Plan protocols and requirements are being followed.

**F3-483  
cont.**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.20-11 – 12

DEIR/DEIS Text:

D.20.3.2 CEQA Significance Criteria

The Hazards and Hazardous materials section of CEQA Guidelines Appendix G identifies one question with regard to wildland fire:

Would the project "expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?"

This question and others related to wildland fire hazards are addressed in this EIR/EIS by considering the following evaluation criteria, which are based on the nature of the Proposed Project and the existing environment:

- a) Would project activities required during construction or maintenance increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources?
- b) Would the presence of the overhead transmission lines increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources? c) Would the presence of the project create obstructions or impediments to fire suppression efforts, resulting in damaging impacts to communities and/or natural resources?
- d) Would activities associated with project construction or maintenance result in a vegetation mix that could increase ignition potential and rate of fire spread?

The criteria used to evaluate these questions are (1) the degree to which the existing situation in the ROW with regard to wildland fire risk and fire suppression would be changed by implementation of the Proposed Project and (2) whether such a change is meaningful.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~This question and others related to wildland fire hazards are addressed in this EIR/EIS by considering the following evaluation criteria, which are based on the nature of the Proposed Project and the existing environment:~~

- ~~a) Would project activities required during construction or maintenance increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources?~~
- ~~b) Would the presence of the overhead transmission lines increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources?~~
- ~~c) Would the presence of the project create obstructions or impediments to fire suppression efforts, resulting in damaging impacts to communities and/or natural resources?~~
- ~~d) Would activities associated with project construction or maintenance result in a vegetation mix that could increase ignition potential and rate of fire spread?~~

~~The criteria used to evaluate these questions are (1) the degree to which the existing situation in the ROW with regard to wildland fire risk and fire suppression would be changed by implementation of the Proposed Project and (2) whether such a change is meaningful.~~

F3-484

### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.20-14

##### DEIR/DEIS Text:

**Impact WF-2: The presence of overhead transmission lines would increase the probability of a wildland fire.**

##### SCE Comment:

The Proposed Project would reduce the number of towers and that should be noted in the text. Please add the following language:

Together, these factors make it highly unlikely that the 220 kV transmission line would pose a fire hazard through arcing or line failure. Additionally, the ROW currently has 220 kV circuits located in it, and the Proposed Project would reduce the number of structures within the corridor, thus not adding a significant new risk as compared to existing conditions.

F3-485

#### Page D.20-19

##### DEIR/DEIS Text:

**Impact WF-1: Construction or maintenance activities would increase the probability of a wildland fire (Class II)**

For connected actions in the Desert Center and Blythe areas, mitigation measures to address increased wildfire risks during construction and operation of the facilities are expected to be required by the agencies approving those projects. These would be tailored to the nature of the project and local conditions. These would ensure that this impact is less than significant (Class II).

##### SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-486

#### Page D.20-19

##### DEIR/DEIS Text:

After implementation of the Proposed Project, conditions in the ROW with regard to wildfire risks would not be significantly changed from existing conditions. Towers and conductors would still be present in approximately the same locations. SCE and fire agencies would continue to follow existing procedures and regulations for managing wildfire risk. No mitigation is required. The impact would be less than significant (Class III).

##### SCE Comment:

For clarification, please make the following revisions:

After implementation of the Proposed Project, conditions in the ROW with regard to wildfire risks would not be significantly changed from existing conditions. However, the Proposed Project would reduce the number of structures within the corridor. Towers and conductors would still be present in approximately the same locations. SCE and fire agencies would continue to follow existing procedures and regulations for managing wildfire risk. No mitigation is required. The impact would be less than significant (Class III).

F3-487

#### Page D.20-19

##### DEIR/DEIS Text:

**Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts (Class III)**

With implementation of the Proposed Project, structure and conductor heights in the ROW and safety distances from the transmission line would increase nominally. This would not be a significant change from existing conditions. SCE and fire agencies would continue to follow existing procedures and regulations for conducting and managing wildfire suppression. No mitigation is required. The impact would be less than significant (Class III).

##### SCE Comment:

The Proposed Project would reduce the number of towers, which should be noted in the text. The presence of the project can also provide benefit to fire suppression efforts; please add the following language:

The Proposed Project would reduce the number of towers. Utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.

F3-488



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.20-19

DEIR/DEIS Text:

**Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts (Class III)**

For connected actions in the Desert Center and Blythe areas, gen-tie lines would be installed; however, these not as tall as high-voltage transmission lines. Also, the areas of the connected actions are sparsely vegetated, reducing fire risk. During fire suppression activity, pilots and ground crews are advised of the location of lines. Agencies would follow existing procedures for conducting and managing wildfire suppression. These would ensure that this impact is less than significant (Class III).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-489

Page D.20-20

DEIR/DEIS Text:

**Impact WF-4: Construction or maintenance activities would result in a vegetation fuel mix that increases ignition potential and rate of fire spread (Class II)**

For connected actions, approving agencies are expected to require weed management and abatement programs to address this impact. These measures would ensure that this impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

F3-490

Page D.20-24

DEIR/DEIS Text:

D.20.4.3 Phased Build Alternative

Impact WF-1: Construction or maintenance activities would increase the probability of a wildland fire

Impact WF-2: The presence of overhead transmission lines would increase the probability of a wildland fire

Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts

Impact WF-4: Construction or maintenance activities would result in a vegetation fuel mix that increases ignition potential and rate of fire spread

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional wildland fire impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

F3-491

## Responses to Comment Set F3 – Section D.20 Wildland Fire

- F3-482 The commenter asks that a sentence be added in the introduction to Section D.20 (Wildland Fire) stating that “utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line.” No change in the EIS is required. The paragraph in question describes various risk conditions for firefighting in the vicinity of power lines and acknowledges that utility access roads also provide fire crew access and may be used as fire breaks. It is not clear how utility facilities could assist initial attack and containment except if utility personnel happened to be in the vicinity and were appropriately equipped.
- F3-483 The commenter believes the requirement in Mitigation Measure WF-1a (Prepare and implement a Fire Management Plan) that a draft of the Plan be circulated to fire agencies for comment and that comments be reconciled in consultation with CALFIRE, BLM, and the Morongo Fire Department, as appropriate, are disproportionate to the impact in terms of the benefit achieved for the time and effort needed for the coordination.
- The BLM disagrees. No information is provided on how or why this consultation requirement is onerous. Once a draft Fire Management Plan is developed, it should be a straightforward process to provide a copy to the fire agencies, requesting comments by a reasonable date. Likewise, consulting with CALFIRE, BLM, and the Morongo Fire Department, as appropriate, on resolving the comments when developing the final Plan is a reasonable coordination activity, particularly as portions of the Project ROW are in high fire hazard areas.
- F3-484 This comment questions the use of significance criteria not specifically found in CEQA guidelines. This comment relates to CEQA, not NEPA. Please see Response to Comment F3-95.
- F3-485 The commenter requests revision to a sentence in Section D.20.3.3 (Wildland Fire, Impacts and Mitigation Measures) under Impact WF-2 (The presence of overhead transmission lines would increase the probability of a wildland fire). The suggested revision would note that the Proposed Project would reduce the number of structures in the corridor.
- No change in the EIS is required. The Project description fully discloses that there would be fewer structures in the ROW. The discussion cited in Wildland Fire concludes that the Project would not be adding a significant new risk as compared to existing conditions. While the suggested revision is accurate with regard to the number of structures, it is unnecessary. It also fails to note that while the number of structures would be less, the number of circuits would be the same and the proposed new towers would be taller.
- F3-486 This comment request clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. Clarification has been added in Section D.1.5 (Analysis of Connected Actions). See Response to Comment F3-102.
- F3-487 The commenter requests a revision in Section D.20.3.5 (CEQA Significance Determination for Proposed Project and Connected Actions), under Impact WF-2 (The presence of overhead transmission lines would increase the probability of a wildland fire). This comment relates to CEQA, not NEPA. Please see Response to Comment F3-485, addressing this requested revision.
- F3-488 This comment is similar to F3-482 regarding assisting in attack and containment of fire in the vicinity of a line. Please see Response to Comment F3-482.



- F3-489 This comment questions the use of significance criteria not specifically found in CEQA guidelines. This comment relates to CEQA, not NEPA. Please see Response to Comment F3-95.
- F3-490 This comment questions the use of significance criteria not specifically found in CEQA guidelines. This comment relates to CEQA, not NEPA. Please see Response to Comment F3-95.
- F3-491 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

## Comment Set F3: Southern California Edison Company (cont.)

### Section D.21 Electrical Interference and Safety

#### Page D.21-1

##### DEIR/DEIS Text:

This section describes certain effects that are unique to public safety in the vicinity of electrical transmission, including electrical interference and hazards. Please see EIR/EIS Section B.5 for information on electric and magnetic fields (EMF). The following discussions address existing environmental conditions in the affected area, identify and analyze environmental impacts, and recommend measures to reduce or avoid adverse impacts anticipated from project construction and operation. In addition, existing laws and regulations relevant to electrical interference and safety are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might otherwise occur with the implementation of the project. Section D.21.1 presents the affected environment for Electrical Interference and Safety. Relevant regulations and standards are summarized in Section D.21.2. Sections D.21.3 through D.21.5 describe the impacts of the Proposed Project and the alter-natives. Section D.21.6 presents the mitigation measures and mitigation monitoring requirements, and D.21.7 lists references cited.

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

This section describes certain potential effects that are unique to public safety in the vicinity of electrical transmission, including electrical interference and hazards. Please see EIR/EIS Section B.5 for information on electric and magnetic fields (EMF). The following discussions address existing environmental conditions in the affected area, identify and analyze environmental impacts, and recommend measures to reduce or avoid potential adverse impacts anticipated from project construction and operation. In addition, existing laws and regulations relevant to electrical interference and safety are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might otherwise occur with the implementation of the project. Section D.21.1 presents the affected environment for potential Electrical Interference and Safety. Relevant regulations and standards are summarized in Section D.21.2. Sections D.21.3 through D.21.5 describe the impacts of the Proposed Project and the alter-natives. Section D.21.6 presents the mitigation measures and mitigation monitoring requirements, and D.21.7 lists references cited.

#### Page D.21-1

##### DEIR/DEIS Text:

Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses since the equipment is shielded by buildings and walls. However, magnetic fields can penetrate buildings and walls, thereby interacting with electronic equipment. Depending upon the sensitivity of equipment, the magnetic fields have been found to interfere with electric equipment operation...

##### SCE Comment:

As there is no evidence that the existing or future magnetic fields will interact with electronic equipment please make the following revisions:

Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses since the equipment is shielded by buildings and walls. However, magnetic fields can penetrate buildings and walls, thereby potentially interacting with electronic equipment. Depending upon the sensitivity of equipment, the magnetic fields have been found to interfere with electric equipment operation...

F3-492

F3-493

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page D.21-2

##### DEIR/DEIS Text:

The most common electronic equipment that can be susceptible to magnetic field interference is older CRT televisions or computer monitors. Magnetic field interference results in disturbances to the image displayed on the monitor, often described as screen distortion, "jitter," or other visual defects. In most cases it is annoying, and at its worst, it can prevent use of the monitor. This type of interference is a recognized problem in the video monitor industry. As a result, there are manufacturers who specialize in monitor interference solutions and shielding equipment. Possible solutions to this problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of CRT monitors with current technology displays that are not susceptible to magnetic field interference.

##### SCE Comment:

As there is no evidence that existing or future magnetic fields will interfere with electronic devices please make the following revisions:

The most common electronic equipment that can be susceptible to magnetic field interference is older CRT televisions or computer monitors. Potential magnetic field interference results in disturbances to the image displayed on the monitor, often described as screen distortion, "jitter," or other visual defects. In most cases it is annoying, and at its worst, it can prevent use of the monitor. This type of interference is a recognized problem in the video monitor industry. As a result, there are manufacturers who specialize in monitor interference solutions and shielding equipment. Possible solutions to this potential problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of CRT monitors with current technology displays that are not susceptible to magnetic field interference.

#### Page D.21-2

##### DEIR/DEIS Text:

Power line fields can induce voltages and currents on conductive objects, such as metal roofs or buildings, fences, and vehicles. Transmission lines are designed to limit the short circuit current, from conductive items beneath the line, to a safe level (less than 5 milliamperes). When a person or animal comes in contact with a conductive object, a perceptible current or small electric shock may occur. These small electric shocks cause no physiological harm; however, they may present a nuisance.

##### SCE Comment:

To clarify that the text is address conductive materials, please make the following revisions:

Power line fields can induce voltages and currents on conductive objects, such as metal roofs or buildings, metal fences, and vehicles. Transmission lines are designed to limit the short circuit current, from conductive items beneath the line, to a safe level (less than 5 milliamperes). When a person or animal comes in contact with a conductive object, a perceptible current or small electric shock may occur. These small electric shocks cause no physiological harm; however, they may present a nuisance.

F3-494

F3-495

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.21-2**

**DEIR/DEIS Text:**

The connected solar projects would be located in rural or remote areas and would interconnect to existing substations. The lines connecting the generators to the substations (gen-tie lines) would be in existing transmission line corridors or require new corridors. The effect in terms of electrical interference and safety would be similar in nature to the Proposed Project. However, the connected action projects are in remote or rural areas and the population in the vicinity of these lines would be low.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The connected solar projects would be located in rural or remote areas and would interconnect to existing substations. The lines connecting the generators to the substations (gen-tie lines) would be in existing transmission line corridors or require new corridors. The effect in terms of potential electrical interference and safety would could be similar in nature to the Proposed Project. However, the connected action projects are in remote or rural areas and the population in the vicinity of these lines would be low.

F3-496

**Page D.21-3**

**DEIR/DEIS Text:**

The impact assessment for electrical interference and hazards was conducted through a review of the change in power line field strength in the environment that would occur due to the construction and operation of the project. Within the ROW, the proposed transmission line would be the predominant source of electrical interference and hazards. Further, the area within the transmission line ROW is within the control of SCE with regard to development land use restrictions and public access. In areas outside of the ROW, and as the distance from the transmission line increases, there may be other sources of electrical interference and hazards not associated with the project that affect the level of electrical interference. Therefore, the edge of the transmission line ROW was adopted as the point of reference for assessing Project impacts with respect to electrical interference and hazards.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The impact assessment for potential electrical interference and hazards was conducted through a review of the change in power line field strength in the environment that would occur due to the construction and operation of the project. Within the ROW, the proposed transmission line would be the predominant source of potential electrical interference and hazards. Further, the area within the transmission line ROW is within the control of SCE with regard to development land use restrictions and public access. In areas outside of the ROW, and as the distance from the transmission line increases, there may be other sources of potential electrical interference and hazards not associated with the project that affect the level of potential electrical interference. Therefore, the edge of the transmission line ROW was adopted as the point of reference for assessing Project impacts with respect to potential electrical interference and hazards.

F3-497

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.21-4**

**DEIR/DEIS Text:**

**D.21.3.2 CEQA Significance Criteria**

The Environmental Checklist Form in Appendix G of the State CEQA Guidelines does not provide any significance criteria related to electrical hazards and interference. CEQA significance determinations for electrical interference and safety are made based on reasonably assumed potential impacts, as described below. For purposes of the CEQA analysis for this Project, an impact would be considered significant and require additional mitigation if Project construction or if maintenance of Project facilities during Project operations would:

- Create interference with radio, television, communications, or electronic equipment.
- Create hazards to the public through Project-induced currents or shocks.
- Create interference with cardiac pacemakers.

**SCE Comment:**

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

- ~~Create interference with radio, television, communications, or electronic equipment.~~
- ~~Create hazards to the public through Project-induced currents or shocks.~~
- ~~Create interference with cardiac pacemakers.~~

F3-498

**Page D.21-4**

**DEIR/DEIS Text:**

SCE proposed no Applicant Proposed Measures related to electrical interference and hazards.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

SCE proposed no Applicant Proposed Measures related to potential electrical interference and hazards.

F3-499

**Page D.21-4**

**DEIR/DEIS Text:**

This section presents discussion of impacts related to electrical interference and safety, and mitigation measures for the West of Devers Upgrade Project.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

This section presents discussion of impacts related to potential electrical interference and safety, and mitigation measures for the West of Devers Upgrade Project.

F3-500

**Page D.21-4**

**DEIR/DEIS Text:**

The Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could cause the following types of electrical interference and hazards.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could cause the following types of potential electrical interference and hazards.

F3-501



**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.21-4**

**DEIR/DEIS Text:**

Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if it were to occur. Individual sources of adverse radio/television interference impacts can be located and corrected on power lines. Conversely, magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a and EIS-1b would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards or that corona will be an issue, please make the following revisions:

Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if it were to occur. Individual sources of potential adverse radio/television interference impacts can be located and corrected on power lines. Conversely, potential magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a and EIS-1b would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

**F3-502**

**Page D.20-5**

**DEIR/DEIS Text:**

**EIS-2a Implement grounding measures.** As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

**SCE Comment:**

Please make the following clarifying revisions:

**EIS-2a Implement grounding measures.** As part of the siting and construction process, SCE shall identify objects (such as metal fences, metal buildings, and metal pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

**F3-503**

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page D.21-5

##### DEIR/DEIS Text:

The Proposed Project's direct and indirect impacts to electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a and EIS-1b, presented below. Mitigation Measure EIS-1a (Limit the conductor surface gradient) ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) ensures complaints regarding electronic interference would be logged and resolved to the extent feasible.

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The Proposed Project's direct and indirect impacts to potential electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a and EIS-1b, presented below. Mitigation Measure EIS-1a (Limit the conductor surface gradient) ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) ensures complaints regarding electronic interference would be logged and resolved to the extent feasible.

#### Page D.21-5

##### DEIR/DEIS Text:

**EIS-2a Implement grounding measures.** As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

##### SCE Comment:

To clarify that the text addresses conductive materials, please make the following revisions:

**EIS-2a Implement grounding measures.** As part of the siting and construction process, SCE shall identify objects (such as metal fences, metal buildings, and metal pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

#### Page D.21-6

##### DEIR/DEIS Text:

The impacts of the connected solar projects in terms of electrical interference and safety would be similar to those described for the Proposed Project. The impacts would be created by the gen-tie lines connecting the solar projects to SCE substations. Because of the remote location of the solar projects, the potentially affected population would be small.

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The impacts of the connected solar projects in terms of potential electrical interference and safety would could be similar to those described for the Proposed Project. The potential impacts would be created by the gen-tie lines connecting the solar projects to SCE substations. Because of the remote location of the solar projects, the potentially affected population would be small.

F3-504

F3-505

F3-506



**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.21-6**

**DEIR/DEIS Text:**

This impact would be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The potential impact would could be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.

**F3-507**

**Page D.21-6**

**DEIR/DEIS Text:**

This impact would be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The potential impact would could be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.

**F3-508**

**Pages D.21-6 through 7**

**DEIR/DEIS Text:**

*Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)*

For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the impact is less than significant (Class II).

**SCE Comment:**

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

**F3-509**

**Page D.21-7**

**DEIR/DEIS Text:**

The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant for both the Proposed Project and for gen-tie lines associated with the connected solar projects. No mitigation is required (Class III).

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant for both the Proposed Project and for gen-tie lines associated with the connected solar projects. No mitigation is required (Class III).

**F3-510**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-7

DEIR/DEIS Text:

**Impact EIS-2: Project-induced currents or shocks would create hazards to the public (Class II)** Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Pages D.21-6 through D.21-7

DEIR/DEIS Text:

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. Mitigation Measure EIS-1a (Limit the conductor surface gradient) would require SCE to limit the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide, which would minimize disruptions to radio, television, communications, or electrical equipment. Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) would require SCE to respond to, document, and resolve interference complaints related to corona or gap discharges after energizing the transmission line. With implementation of these mitigation measures, this impact would be less than significant (Class II).

For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the impact is less than significant (Class II).

SCE Comment:

As there is no evidence that proposed transmission lines will introduce adverse impacts from corona discharge, please make the following revisions:

Corona or gap discharges related to transmission line operation could potentially cause localized and temporary disruptions to radio, television, communications, or electronic equipment. Mitigation Measure EIS-1a (Limit the conductor surface gradient) would require SCE to limit the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide, which would minimize potential disruptions to radio, television, communications, or electrical equipment. Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) would require SCE to respond to, document, and resolve potential interference complaints related to corona or gap discharges after energizing the transmission line. With implementation of these mitigation measures, this potential impact would be less than significant (Class II).

For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the potential impact is less than significant (Class II).

F3-511

F3-512

**Comment Set F3: Southern California Edison Company (cont.)**

**Page D.21-7**

**DEIR/DEIS Text:**

After the gen-tie lines are energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. Mitigation Measure EIS-2a (Implement grounding measures) would reduce the potential for this adverse impact through the provision of a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock. With implementation of mitigation, this impact would be less than significant (Class II).

Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the impact is less than significant (Class II).

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

After the gen-tie lines are energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. Mitigation Measure EIS-2a (Implement grounding measures) would reduce the potential for this adverse impact through the provision of a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock. With implementation of mitigation, this potential impact would be less than significant (Class II).

Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the potential impact is less than significant (Class II).

**Page D.21-7**

**DEIR/DEIS Text:**

Three alternatives are considered in this section; all of these alternatives would be located within the existing WOD ROW. The No Project/No Action Alternative is evaluated in Section D.21.5. Alternatives are described in detail in Appendix 5 (Alternatives Screening Report) and are summarized in Section C.

Electrical interference and safety within the ROW is described in Section D.21.1.1 above; the description of the environmental setting would apply equally to the alternatives.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

Three alternatives are considered in this section; all of these alternatives would be located within the existing WOD ROW. The No Project/No Action Alternative is evaluated in Section D.21.5. Alternatives are described in detail in Appendix 5 (Alternatives Screening Report) and are summarized in Section C.

Potential Electrical interference and safety within the ROW is described in Section D.21.1.1 above; the description of the environmental setting would apply equally to the alternatives.

**F3-513**

**F3-514**

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.21-7**

**DEIR/DEIS Text:**

The Tower Relocation Alternative would locate certain transmission structures in Segments 4 and 6 farther from existing homes than would be the case under the Proposed Project.

Three impacts related to electrical interference and safety were identified for the Proposed Project. These impacts also would apply to the Tower Relocation Alternative, which overall would be the same as the Proposed Project, with the exception of the relocated transmission towers that are described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The Tower Relocation Alternative would locate certain transmission structures in Segments 4 and 6 farther from existing homes than would be the case under the Proposed Project.

Three potential impacts related to electrical interference and safety were identified for the Proposed Project. These potential impacts also would apply to the Tower Relocation Alternative, which overall would be the same as the Proposed Project, with the exception of the relocated transmission towers that are described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

F3-515

**Page D.21-8**

**DEIR/DEIS Text:**

The minor adjustment to the location of these towers would not differ from the Proposed Project's minor risk of interference with cardiac pacemakers. No mitigation is proposed.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The minor adjustment to the location of these towers would not differ from the Proposed Project's minor potential risk of interference with cardiac pacemakers. No mitigation is proposed.

F3-516

**Page D.21-8**

**DEIR/DEIS Text:**

The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The CEQA significance determination for each potential electrical interference and safety impact in this alternative is presented below.

F3-517

### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.21-8

##### DEIR/DEIS Text:

In general, the relocated towers would be moved approximately 50 feet farther from the southern edge of the ROW. Relocating towers in the identified project segments would shift the transmission line slightly farther from the edge of the ROW. This nominal change in distance is not expected to substantially alter (increase or decrease) the effects of the transmission line with regard to electric interference, although the risk of electric interference would be reduced very slightly for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

In general, the relocated towers would be moved approximately 50 feet farther from the southern edge of the ROW. Relocating towers in the identified project segments would shift the transmission line slightly farther from the edge of the ROW. This nominal change in distance is not expected to substantially alter (increase or decrease) the effects of the transmission line with regard to potential electric interference, although the risk of potential electric interference would be reduced very slightly for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit potential interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

F3-518

#### Page D.21-8

##### DEIR/DEIS Text:

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Corona or gap discharges related to transmission line operation could potentially cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this potential impact would be less than significant (Class II).

F3-519

#### Page D.21-8

##### DEIR/DEIS Text:

After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

F3-520



**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

**Page D.21-8**

**DEIR/DEIS Text:**

The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The function of some pacemakers could potentially be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).

**Page D.21-9**

**DEIR/DEIS Text:**

The Iowa Street 66 kV Underground Alternative would place a 1,600-foot segment of subtransmission line underground, rather than overhead.

Three impacts were identified under the Proposed Project for electrical interference and safety. These impacts also would apply to the Iowa Street 66 kV Underground Alternative, which overall would be the same as the Proposed Project, with the exception of the underground portion of the subtransmission line that is described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The Iowa Street 66 kV Underground Alternative would place a 1,600-foot segment of subtransmission line underground, rather than overhead.

Three potential impacts were identified under the Proposed Project for electrical interference and safety. These potential impacts also would apply to the Iowa Street 66 kV Underground Alternative, which overall would be the same as the Proposed Project, with the exception of the underground portion of the subtransmission line that is described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

F3-521

F3-522

### Comment Set F3: Southern California Edison Company (cont.)

#### Page D.21-9

##### DEIR/DEIS Text:

This alternative would place a 1,600-foot segment of 66 kV subtransmission line underground instead of on overhead poles. This short underground segment would decrease slightly the effects of the transmission line with regard to electric interference for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

This alternative would place a 1,600-foot segment of 66 kV subtransmission line underground instead of on overhead poles. This short underground segment would decrease slightly the effects of the transmission line with regard to potential electric interference for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit the potential interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

F3-523

#### Page D.21-9

##### DEIR/DEIS Text:

This short underground segment would decrease slightly the Proposed Project's risk to the public through project-induced currents or shocks, because the conductors in this area would be underground and not accessible. There would be transition structures at the north and south ends of the under-ground segment, and these facilities would still have the potential to create shock hazards. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

This short underground segment would decrease slightly the Proposed Project's potential risk to the public through project-induced currents or shocks, because the conductors in this area would be underground and not accessible. There would be transition structures at the north and south ends of the under-ground segment, and these facilities would still have the potential to create shock hazards. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

F3-524

#### Page D.21-9

##### DEIR/DEIS Text:

This short underground segment would decrease slightly the risk of interference with cardiac pacemakers as compared with the Proposed Project. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

This short underground segment would decrease slightly the potential risk of interference with cardiac pacemakers as compared with the Proposed Project. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.

F3-525



### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

#### Page D.21-9

##### DEIR/DEIS Text:

The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The CEQA significance determination for each potential electrical interference and safety impact in this alternative is presented below.

F3-526

#### Page D.21-9

##### DEIR/DEIS Text:

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Corona or gap discharges related to transmission line operation could potentially cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this potential impact would be less than significant (Class II).

F3-527

#### Page D.21-10

##### DEIR/DEIS Text:

The Iowa Street 66 kV Underground Alternative would eliminate the potential for induced current or shocks in the underground segment, but the transition structures would remain at each end of the segment. At these structures, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).

##### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The Iowa Street 66 kV Underground Alternative would eliminate the potential for induced current or shocks in the underground segment, but the transition structures would remain at each end of the segment. At these structures, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

F3-528

Comment Set F3: Southern California Edison Company (cont.)

Page D.29-10

DEIR/DEIS Text:

The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).

Page D.21-10

DEIR/DEIS Text:

The Phased Build Alternative would retain existing double-circuit 220 kV transmission structures to the extent feasible, remove single-circuit structures, add new double-circuit 220 kV structures, and string all structures with higher-capacity conductors.

Three impacts were identified under the Proposed Project for electrical interference and safety. These impacts also would apply to the Phased Build Alternative, which would be located in the same corridor as the Proposed Project and would involve similar although less intense construction activities. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The Phased Build Alternative would retain existing double-circuit 220 kV transmission structures to the extent feasible, remove single-circuit structures, add new double-circuit 220 kV structures, and string all structures with higher-capacity conductors.

Three potential impacts were identified under the Proposed Project for electrical interference and safety. These potential impacts also would apply to the Phased Build Alternative, which would be located in the same corridor as the Proposed Project and would involve similar although less intense construction activities. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

F3-529

F3-530

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-10

DEIR/DEIS Text:

In the locations where the structures in this alternative would be farther from the edge of the ROW than the Proposed Project structures, the potential for project-induced electrical interference would be reduced. Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference. The same as for the Proposed Project, corona or gap discharges related to high frequency radio and television interference adverse effects are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if they were to occur. Individual sources of adverse radio/television interference impacts can be located and corrected on power lines. Conversely, magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

SCE Comment:

There is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards. Electrical interference with radio, television, etc. is based on electrical field influences as opposed to magnetic field, therefore, given that the alternative operates at the same voltage as the proposed project there will be no reduction of the interference by selection of the alternative. Please make the following revisions:

In the locations where the structures in this alternative would be farther from the edge of the ROW than the Proposed Project structures, the potential for project-induced electrical interference would be reduced. Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference. The same as for the Proposed Project, corona or gap discharges related to high frequency radio and television interference potential adverse effects are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if they were to occur. Individual sources of potential adverse radio/television interference impacts can be located and corrected on power lines. Conversely, potential magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit the potential interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

F3-531

Comment Set F3: Southern California Edison Company (cont.)

Pages D.21-10 through 11

DEIR/DEIS Text:

Due to the Segment 4 and 6 locations where the alternative would be further from the edge of ROW than the Proposed Project, the potential for hazards to the public due to project-induced currents may be reduced for the nearest residents compared to the Proposed Project. However, because much of the ROW is accessible to the public the risk of project-induced currents or shocks would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, induced currents and voltages on conducting objects near the proposed transmission lines represent a potential adverse impact that can be mitigated. These impacts do not pose a threat in the environment if the conducting objects are properly grounded. Mitigation Measure EIS-2a (Implement grounding measures) would provide a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Due to the Segment 4 and 6 locations where the alternative would be further from the edge of ROW than the Proposed Project, the potential for hazards to the public due to project-induced currents may be reduced for the nearest residents compared to the Proposed Project. However, because much of the ROW is accessible to the public the potential risk of project-induced currents or shocks would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, induced currents and voltages on conducting objects near the proposed transmission lines represent a potential adverse impact that can be mitigated. These potential impacts do not pose a threat in the environment if the conducting objects are properly grounded. Mitigation Measure EIS-2a (Implement grounding measures) would provide a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock.

F3-532

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page D.21-11

#### DEIR/DEIS Text:

The potential for interference with cardiac pacemakers would be slightly reduced compared to the Proposed Project for locations along the corridor where the structures in this alternative would be located further from the edge of the ROW. However, because much of the ROW is accessible to the public the risk of interference with cardiac pacemakers would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, the function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project (i.e., adjacent to the transmission line ROW), potentially resulting in inaccurate detections by the pacemaker of normal cardiac signals or resulting in inappropriate behavior, until the field strength is reduced by the individual leaving the immediate area. However, the biological consequences of transient, reversible pacemaker malfunction are mostly benign because, as discussed in Section D.21.3.3, most modern units revert to a fixed-rate pacing mode, which is life-sustaining. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.

#### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The potential for interference with cardiac pacemakers would be slightly reduced compared to the Proposed Project for locations along the corridor where the structures in this alternative would be located further from the edge of the ROW. However, because much of the ROW is accessible to the public the potential risk of interference with cardiac pacemakers would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, the function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project (i.e., adjacent to the transmission line ROW), potentially resulting in inaccurate detections by the pacemaker of normal cardiac signals or resulting in inappropriate behavior, until the field strength is reduced by the individual leaving the immediate area. However, the biological consequences of transient, reversible pacemaker malfunction are mostly benign because, as discussed in Section D.21.3.3, most modern units revert to a fixed-rate pacing mode, which is life-sustaining. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.

### Page D.21-11

#### DEIR/DEIS Text:

The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.

#### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The CEQA significance determination for each potential electrical interference and safety impact in this alternative is presented below.

F3-533

F3-534



Comment Set F3: Southern California Edison Company (cont.)

Page D.21-11

DEIR/DEIS Text:

*Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)*

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

SCE Comment:

The DEIR/DEIS does not sufficiently recognize that the use of 795 Drake ACCR results in a higher conductor surface gradient than the selection of two bundled 1590 ACSR. Please make the following revisions:

*Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)*

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. The potential for corona or gap discharges operations with the Phase Build Alternative are likely greater than those expected in the project because the conductor surface gradient of the single conductor 795 ACSR would be significantly greater than the conductor surface gradient of the two bundled 1590 ACSR as designed in the Proposed Project. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

Page D.21-11

DEIR/DEIS Text:

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Corona or gap discharges related to transmission line operation could potentially cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this potential impact would be less than significant (Class II).

Page D.21-11

DEIR/DEIS Text:

After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

F3-535

F3-536

F3-537

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page D.21-11

#### DEIR/DEIS Text:

The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).

#### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).

F3-538

### Page D.21-12

#### DEIR/DEIS Text:

**No Project Alternative Transmission Lines and Beaumont Substation.** Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a bio-logical need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

#### SCE Comment:

To clarify that the text is addressing conductive materials, please make the following revisions:

**No Project Alternative Transmission Lines and Beaumont Substation.** Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for metal fences, metal building, metal pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a bio-logical need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

F3-539



Comment Set F3: Southern California Edison Company (cont.)

Page D.21-12

DEIR/DEIS Text:

Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause potential interference with radio, television, communications or electronic equipment and induce currents or shocks that ~~would~~ could be potential hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of potential interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

Page D.21-13

DEIR/DEIS Text:

**EIS-2a: Implement Grounding Measures.** As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

SCE Comment:

To clarify that the text is addressing conductive materials, please make the following revisions:

**EIS-2a: Implement Grounding Measures.** As part of the siting and construction process, SCE shall identify objects (such as metal fences, metal buildings, and metal pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

F3-540

F3-541

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page D.21-12

**DEIR/DEIS Text:**

F3-542

No Project Alternative Option 2 would require the construction of over 40 miles of new 500 kV transmission line, following the existing Valley-Serrano 500 kV line. The alternative is described in Section C.6.3.2, and illustrated on Figure C-6b. The ROW between the Valley Substation and the Serrano Substation contains an existing 500 kV transmission line. This alternative would add a second 500 kV circuit within or adjacent to the existing ROW. Operation of this new circuit would cause changes in the power line field strength at the edge of the ROW. These changes could cause interference with radio, television, communications or electronic equipment. The new circuit could also create a hazard for workers or the public through induced currents or shocks. The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the new 500 kV circuit. Electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. The potential electrical interference and electrical hazards associated with the new 500 kV circuit would not be substantially different than under existing conditions, and can be reduced through implementation of recommended mitigation described in the Proposed Project and Option 1.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

No Project Alternative Option 2 would require the construction of over 40 miles of new 500 kV transmission line, following the existing Valley-Serrano 500 kV line. The alternative is described in Section C.6.3.2, and illustrated on Figure C-6b. The ROW between the Valley Substation and the Serrano Substation contains an existing 500 kV transmission line. This alternative would add a second 500 kV circuit within or adjacent to the existing ROW. Operation of this new circuit would cause changes in the power line field strength at the edge of the ROW. These changes could cause potential interference with radio, television, communications or electronic equipment. The new circuit could also potentially create a hazard for workers or the public through induced currents or shocks. The function of some pacemakers could potentially be altered by exposure to electric fields that would be generated in the immediate vicinity of the new 500 kV circuit. Potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. The potential electrical interference and electrical hazards associated with the new 500 kV circuit would not be substantially different than under existing conditions, and can be reduced through implementation of recommended mitigation described in the Proposed Project and Option 1.

### Responses to Comment Set F3 – Section D.21 Electrical Interference and Safety

- F3-492 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). Impact analyses in environmental documents discuss environmental impacts that could happen, but may not necessarily occur as the result of a project. Therefore, they are uncertain by nature, so the discussions of impacts in the EIS are already considered potential. Therefore, there is no need to modify the text throughout to make this distinction, and the EIS has not been revised.
- F3-493 The commenter states that as there is no evidence that the existing or future magnetic fields will interact with electronic equipment, the EIS should be revised to add “potentially” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-494 The commenter states that as there is no evidence that existing or future magnetic fields will interfere with electronic devices, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-495 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. The text under Induced Currents and Shock Hazards in Section D.21.1 (Environmental Setting / Affected Environment) of the Final EIS has been revised as suggested to add the word “metal” to describe fences capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-503, F3-505, F3-539, and F3-541.
- F3-496 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-497 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-498 The commenter states that significance criteria not found in CEQA guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. Therefore, the commenter requests deletion of the significance criteria listed in Section D.21.3.2 (CEQA Significance Criteria) regarding electrical interference and safety hazards. This comment relates to CEQA, not NEPA. Please see Response to Comment F3-95. No change in the EIS is required as a result of this comment.
- F3-499 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

- F3-500 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-501 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-502 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-503 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. The comment references page D.20-5 of the Draft EIR/EIS, but based on its content regarding electrical interference and safety, it is assumed that page D.21-5 is the location of the intended clarification. Therefore, the text in Mitigation Measure EIS-2a (Implement grounding measures) in Section D.21.3.3 (Impacts and Mitigation Measures) of the Final EIS has been revised as suggested to add the word "metal" to describe fences and pipelines capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-495, F3-505, F3-539, and F3-541.
- F3-504 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-505 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. This comment appears to be duplicative of Comment F3-503. Regardless, the text in Mitigation Measure EIS-2a (Implement grounding measures) in Section D.21.3.3 (Impacts and Mitigation Measures) of the Final EIS has been revised as suggested to add the word "metal" to describe fences and pipelines capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-495, F3-503, F3-539, and F3-541.
- F3-506 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-507 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

- F3-508 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-509 The commenter requests that the EIS clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers Upgrade Project. See Response to Comment F3-102 with regard to mitigation for connected actions.
- F3-510 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-511 The commenter requests that the EIS should clarify under Impact EIS-2 (Project-induced currents or shocks would create hazards to the public) that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers Upgrade Project. See Response to Comment F3-509.
- F3-512 The commenter states that as there is no evidence that transmission lines will introduce adverse impacts from corona discharge, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-513 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-514 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-515 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-516 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-517 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.



- F3-518 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-519 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” and “potentially” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-520 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-521 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-522 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-523 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-524 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-525 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-526 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-527 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” and “potentially” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-528 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to

add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

- F3-529 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” and “potentially” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-530 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-531 The commenter requests deletion of the statement that under the Phased Build Alternative a reduced amount of power flow would lead to a reduced potential for electrical interference. Impact EIS-1 (Project could create interference with radio, television, communications, or electronic equipment) in Section D.21.4.3 (Phased Build Alternative) of the Final EIS has been revised to remove the sentence. In addition, a similar statement has been removed from Section ES.4.21.2 (Effects of Alternatives on Electrical Interference and Safety) in the Executive Summary of the Final EIS (see Response to Comment F3-11).
- F3-532 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-533 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” and “potentially” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-534 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-535 The commenter states that the Draft EIR/EIS does not sufficiently recognize that the use of 795 Drake ACCR results in a higher conductor surface gradient than the selection of two bundled 1590 ACSR and requests a text addition to the effect under Impact EIS-1 (Project could create interference with radio, television, communications, or electronic equipment) in Section D.21.4.3 (Phased Build Alternative).
- The EIS Team agrees that the potential for corona is likely higher, however, gap discharges are not related to the conductor size. Therefore, the text has been revised in the Final EIS, but gap discharges are not included in the statement.
- F3-536 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” and “potentially” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.



- F3-537 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-538 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” and “potentially” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-539 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. The text in Section D.21.5.1 (No Project Alternative Option 1) of the Final EIS has been revised, as suggested, to add the word “metal” to describe fences and pipelines capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-495, F3-503, F3-505, and F3-541.
- F3-540 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” and “could” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.
- F3-541 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. The text of Mitigation Measure EIS-2a (Implement grounding measures) in Table D.21 1 (Mitigation Monitoring Program – Electrical Interference and Safety) in Section D.21.6 (Mitigation Monitoring, Compliance, and Reporting) of the Final EIS has been revised as suggested to add the word “metal” to describe fences and pipelines capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-495, F3-503, F3-505, and F3-539.
- F3-542 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add “potential” and “potentially” to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

## Comment Set F3: Southern California Edison Company (cont.)

### Section E Cumulative Scenario and Impacts

#### Page E-13

##### DEIR/DEIS Text:

While SCE states that it currently has no specific plans for transmission expansion in the WOD corridor, there are other regional studies that point to the potential for future development.

##### SCE Comment:

Please make the following revision:

While SCE states that it currently has no specific plans for transmission expansion in the WOD corridor, and CAISO has not studied nor identified the need for transmission expansion in the WOD corridor beyond SCE's Proposed West of Devers Upgrade Project. there are other regional studies that point to the potential for future development.

F3-543

#### Page E-17

##### DEIR/DEIS Text:

Based on the information above, the CPUC and BLM have determined that a future 500 kV transmission line in the WOD corridor is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS.

##### SCE Comment:

Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor.

F3-544

#### Page E-17

##### DEIR/DEIS Text:

The potential future 500 kV transmission structures in that segment would likely be new tubular steel poles approximately 190 to 200 feet tall, most likely located along an existing transmission corridor.

##### SCE Comment:

Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor. Additionally, The assumption that a future 500 kV transmission line would likely use tubular steel poles is speculation as SCE has no specific plans for transmission expansion in the WOD corridor beyond the West of Devers Upgrade nor has CAISO studied or identified the need for which a design would be necessary. Please make the following revisions:

The potential future 500 kV transmission structures in that segment would ~~likely be new tubular steel poles approximately 190 to 200 feet tall, most likely be~~ located along an existing transmission corridor.

F3-545

#### Pages E-19 through 22

##### DEIR/DEIS Text:

Figure E-2a thru Figure E-2d

##### SCE Comment:

The source information for these figures should not reflect "SCE, 2014" because they were not created by SCE, but instead modified from similar figures that SCE provided. In addition, these figures show proposed 500 kV structure locations that, in some instances, improperly reflect minimum distances required between structures of other voltages or reflect the use of TSPs when LSTs may be more appropriate.

Please make the following revision to the DEIR/DEIS language on all four figures. Source: Aspen, 2015, SCE, 2014.

F3-546

**Comment Set F3: Southern California Edison Company, Appendix B (cont.)**

Page E-35

**DEIR/DEIS Text:**

**Severity of Project Contribution to Cumulative Adverse Effects.** Construction and operation of the Proposed Project would result in adverse effects to cultural resources that would combine with the adverse effects from construction and operation of other projects in the cumulative analysis study area to result in a substantial cumulative adverse effect to cultural resources.

**SCE Comment:**

The DEIR/DEIS incorrectly assumes that adverse impacts to cultural resources are inevitable. Please make the following revisions:

**Severity of Project Contribution to Cumulative Adverse Effects.** Construction and operation of the Proposed Project would could result in adverse effects to cultural resources. If the Proposed Project caused an adverse effect to cultural resources, that would combine with the adverse effects from construction and operation of other projects in the cumulative analysis study area, to could result in a substantial cumulative adverse effect to cultural resources.

F3-547

Comment Set F3: Southern California Edison Company (cont.)

Page E-46

DEIR/DEIS Text:

Total Construction Emissions

Estimated Daily Emissions (lbs/day)					
Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.6	0.1	0.0
Tennessee Substation	2.2	0.1	0.6	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Flv	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAOMD Regional	550	75	100	150	55
Exceed SCAQMD	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)					
Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.5	0.1	0.0
Tennessee Substation	2.2	0.1	0.5	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Flv	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAOMD Regional	550	75	100	150	55

SCE Comment:

Please remove references to the Timoteo and Tennessee Substations.

F3-548

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Total Construction Emissions

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Cacho Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.4	0.6	0.4	0.0
Tennessee Substation	2.2	0.4	0.6	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,672.9	912.1	6,838.3	486.8	290.3
SCAOMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Cacho Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.4	0.5	0.4	0.0
Tennessee Substation	2.2	0.4	0.5	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,672.9	912.1	5,470.5	375.8	267.0
SCAOMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

F3-548  
cont.

**Comment Set F3: Southern California Edison Company (cont.)**

**Page E-56**

**DEIR/DEIS Text:**

**Future 500 kV Transmission Line, Cumulative Simulations, KOP#2, #4, #7, #12, #13**

**SCE Comment:**

Cumulative simulations were developed as part of the DEIR/DEIS and used in the analysis to make conclusions related to cumulative impacts of a future 500 kV transmission line. The development of simulations implies that there is a design that has been developed to support locations of structures within the corridor. Consistent with the prior comment, the assumption that a future 500 kV transmission line would likely use tubular steel poles is speculation as SCE has no specific plans for transmission expansion in the WOD corridor beyond the West of Devers Upgrade nor has CAISO studied or identified the need for which a design would be necessary. Simulations should not be included as part of the analysis of a speculative project as it gives a false sense of a level of detail that has not been developed. SCE cannot validate the accuracy or lack thereof for these simulations.

Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor.

**F3-549**

**Page E-59**

**DEIR/DEIS Text:**

**Visual Resources Cumulative Simulation Figure E-3a**

The 500 kV structures would be noticeably taller and would appear somewhat more massive compared to the lattice structures.

**SCE Comment:**

As it relates to the figures for the Cumulative Future 500 kV Corridor Profiles the source is stated as SCE 2014, however, SCE did not provide corridor profiles with 500 kV structures.

**F3-550**

**Page E-73**

**DEIR/DEIS Text:**

The geographic scope for analysis of Proposed Project adverse effects related to electrical interference and safety is the ROW for the entire length of the 220 kV transmission line. The geographic scope for this cumulative analysis is the same as for the Proposed Project, but also includes projects immediately adjacent to the 220 kV ROW. This geographic scope is appropriate because electrical interference and electrical safety hazards attenuate rapidly with distance from the transmission line, and therefore these potential adverse effects would not combine with similar adverse effects from other projects that are not within or immediately adjacent to the Proposed Project ROW.

**SCE Comment:**

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The geographic scope for analysis of Proposed Project potential adverse effects related to electrical interference and safety is the ROW for the entire length of the 220 kV transmission line. The geographic scope for this cumulative analysis is the same as for the Proposed Project, but also includes projects immediately adjacent to the 220 kV ROW. This geographic scope is appropriate because potential electrical interference and electrical safety hazards attenuate rapidly with distance from the transmission line, and therefore these potential adverse effects would not combine with similar potential adverse effects from other projects that are not within or immediately adjacent to the Proposed Project ROW.

**F3-551**



Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages E-73 through 74

DEIR/DEIS Text:

The past, present, and reasonably foreseeable projects that contribute or would contribute to electrical interference and electrical safety hazards within the cumulative analysis study area are limited generally to electrical transmission lines. Several transmission lines currently exist in the Proposed Project corridor, and these past projects contribute to the existing baseline for electrical interference in the study area. Other transmission lines in the region also create electrical interference, but those other regional transmission lines are outside of the cumulative analysis study area because electrical interference from transmission lines attenuates rapidly with distance and would not combine with the potential adverse effects of the Proposed Project. The only project within the cumulative projects study area that could combine with the Proposed Project to result in a cumulative adverse effect is the future 500 kV transmission line, which could result in an increase in electrical interference and electrical safety hazards. This cumulative analysis has determined that a future 500 kV transmission line is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS. The line would be built in SCE's existing ROW and along about 40 miles of the 45-mile project ROW. The future 500 kV line could be single-circuit or double-circuit, and for the purpose of this study, it is assumed to be a double-circuit line. Construction and operation of the Proposed Project would result in minor adverse effects related to electrical interference and electrical safety hazards. These potential adverse effects could combine with the adverse effects on electrical interference and safety from the future 500 kV transmission line to result in a cumulative adverse effect.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The past, present, and reasonably foreseeable projects that contribute or ~~would~~ could contribute to potential electrical interference and electrical safety hazards within the cumulative analysis study area are limited generally to electrical transmission lines. Several transmission lines currently exist in the Proposed Project corridor, and these past projects contribute to the existing baseline for potential electrical interference in the study area. Other transmission lines in the region also create potential electrical interference, but those other regional transmission lines are outside of the cumulative analysis study area because potential electrical interference from transmission lines attenuates rapidly with distance and would not combine with the potential adverse effects of the Proposed Project. The only project within the cumulative projects study area that could combine with the Proposed Project to result in a cumulative potential adverse effect is the future 500 kV transmission line, which could potentially result in an increase in electrical interference and electrical safety hazards. This cumulative analysis has determined that a future 500 kV transmission line is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS. The line would be built in SCE's existing ROW and along about 40 miles of the 45-mile project ROW. The future 500 kV line could be single-circuit or double-circuit, and for the purpose of this study, it is assumed to be a double-circuit line. Construction and operation of the Proposed Project ~~would~~ could result in potential minor adverse effects related to electrical interference and electrical safety hazards. These potential minor adverse effects could combine with the potential adverse effects on electrical interference and safety from the future 500 kV transmission line to result in a cumulative potential adverse effect.

F3-552



Comment Set F3: Southern California Edison Company (cont.)

Page E-74

DEIR/DEIS Text:

Construction and operation of the Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could create: interference with radio, television, communications, or electronic equipment; hazards to the public from project-induced currents or shocks; and, interference with cardiac pacemakers. The only other project within the cumulative projects study area that could result in adverse effects related to electrical interference and safety is the future 500 kV transmission line. Although the future 500 kV transmission line would be geo-graphically contiguous with the majority of the Proposed Project, the construction schedule for the future transmission line would not overlap with the construction schedule of the Proposed Project. Therefore, construction-related adverse effects to electrical interference and safety from the Proposed Project would not combine with construction-related adverse effects to electrical interference and safety from the future transmission line to result in a cumulative effect. However, the operational adverse effects of the future transmission line could combine with the operational adverse effects of the Proposed Project to result in a cumulative adverse effect. Overall, construction and operation of the Proposed Project would result in minor adverse effects related to electrical interference and safety, and the incremental contribution of the Proposed Project to the cumulative adverse effect would be similarly minor.

The severity of the Proposed Project potential adverse effects related to electrical interference and safety, as well as the incremental contribution of the Proposed Project to the cumulative adverse effect, would be reduced through implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient), EIS-1b (Document and resolve electronic interference complaints), and EIS-2a (Implement grounding measures). These mitigation measures are fully described in Section D.21.

With implementation of the mitigation measures noted above and described fully in Section D.21, the incremental contribution of the Proposed Project to the adverse cumulative effect would be negligible.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Construction and operation of the Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could create: interference with radio, television, communications, or electronic equipment; hazards to the public from project-induced currents or shocks; and, interference with cardiac pacemakers. The only other project within the cumulative projects study area that could result in potential adverse effects related to electrical interference and safety is the future 500 kV transmission line. Although the future 500 kV transmission line would be geo-graphically contiguous with the majority of the Proposed Project, the construction schedule for the future transmission line would not overlap with the construction schedule of the Proposed Project. Therefore, construction-related potential adverse effects to electrical interference and safety from the Proposed Project would not combine with construction-related potential adverse effects to electrical interference and safety from the future transmission line to result in a cumulative effect. However, the operational potential adverse effects of the future transmission line could combine with the operational potential adverse effects of the Proposed Project to result in a cumulative potential adverse effect. Overall, construction and operation of the Proposed Project would could result in potential minor adverse effects related to electrical interference and safety, and the incremental contribution of the Proposed Project to the cumulative potential adverse effect would be similarly minor.

The severity of the Proposed Project potential adverse effects related to electrical interference and safety, as well as the incremental contribution of the Proposed Project to the cumulative potential adverse effect, would be reduced through implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient), EIS-1b (Document and resolve electronic interference complaints), and EIS-2a (Implement grounding measures). These mitigation measures are fully described in Section D.21. With implementation of the mitigation measures noted above and described fully in Section D.21, the incremental contribution of the Proposed Project to the potential adverse cumulative effect would be negligible.

F3-553

## Comment Set F3: Southern California Edison Company, Appendix B (cont.)

### Page E-74

#### DEIR/DEIS Text:

Operation of the Proposed Project would combine with the impacts from construction and operation of the future 500 kV transmission line to result in a significant cumulative impact related to electrical interference and safety. Without the implementation of mitigation, the incremental contribution of the Proposed Project to the significant cumulative impact would be cumulatively considerable. However, with implementation of mitigation measures noted above and described fully in Section D.21, the contribution of the Proposed Project to the significant electrical interference and safety cumulative impact would be less than cumulatively considerable.

#### SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Operation of the Proposed Project would could combine with the impacts from construction and operation of the future 500 kV transmission line to result in a potentially significant cumulative impact related to electrical interference and safety. Without the implementation of mitigation, the incremental contribution of the Proposed Project to the potentially significant cumulative impact would be cumulatively considerable. However, with implementation of mitigation measures noted above and described fully in Section D.21, the contribution of the Proposed Project to the potentially significant electrical interference and safety cumulative impact would be less than cumulatively considerable.

F3-554

### Page E-75

#### DEIR/DEIS Text:

##### E-4 Comparison of Alternatives

All of the retained alternatives are located in the same ROW as the Proposed Project and would involve similar types of construction activities. The same list of cumulative projects that could potentially com-bine with the Proposed Project to result in a cumulative adverse effect would also apply to all of the retained alternatives. Therefore, the cumulative analysis presented above for the Proposed Project would also apply to all of the alternatives, and the adverse cumulative effects that are described for the Pro-posed Project would also occur with all of the alternatives.

#### SCE Comment:

The description provided in the Phased Build Alternative (Section C.4.3 and Figure C-5) indicates that the existing double-circuit towers in Segment 6 would remain as-is. Given that those structures are already located at the northern edge of the ROW in this segment, any 'future phase' that would consist of installing a single- or double-circuit 500kV or 220kV line in the vacant space remaining in the ROW would have to be built in the "center" position. This would increase complexity in both terminating that project into Devers Substation (either at 500kV or 220kV switchracks), as well as creating additional crossovers in the Banning Junction, El Casco, and/or San Bernardino Junction area. Such crossovers are not sufficiently incorporated into the alternative project description regarding the location of the future 500kV structures. And because no figures similar to Figures E-2a through E-2d were provided anywhere within the DEIR/DEIS to reflect these orientation details, there is no basis to conclude that the Phase Build Alternative would have similar cumulative impacts, because that latter phase would involve additional construction complexities, including, but not limited to, additional crossovers that would not be necessary if the project were constructed as designed by SCE (i.e. the Proposed Project).

Please make the following revisions:

All of the retained alternatives are located in the same ROW as the Proposed Project and would involve similar types of construction activities, with the exception of the Phased Build Alternative, which would result in greater construction disturbances for the subsequent set of circuits than the Proposed Project. The same list of cumulative projects that could potentially com-bine with the Proposed Project to result in a cumulative adverse effect would also apply to all of the retained alternatives. Therefore, the cumulative analysis presented above for the Proposed Project would also apply to all of the alternatives, and the adverse cumulative effects that are described for the Pro-posed Project would also occur with all of the alternatives with the exception of the Phased Build Alternative, which would result in greater cumulative effects due to the subsequent set of circuits than the Proposed Project.

F3-555

## Responses to Comment Set F3 – Section E Cumulative Scenario and Impacts

- F3-543 As suggested by the commenter, Section E.2.3.1 has been revised to clarify that the CAISO has not studied the need for transmission expansion in the WOD corridor beyond SCE's Proposed West of Devers Upgrade Project.
- F3-544 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) and Response to Comment F1-13 regarding the potential for the Phased Build Alternative to require additional future construction.
- F3-545 The comment state that the EIS speculates that a future 500 kV transmission line would be "likely" to use tubular steel poles, since SCE has no specific plans for transmission expansion in the WOD corridor beyond the West of Devers Upgrade. The description of this future cumulative project clearly states that SCE has no specific plans (Section E.2.3.1, Background). Therefore, the Cumulative Transmission Scenario (Section E.2.3.2) is general in some respects with enough details described and shown on figures to enable an analysis of foreseeable cumulative impacts. The description of the Cumulative Transmission Scenario need not be revised, as it clearly describes what is only "likely" to occur based on other recent SCE major transmission projects reviewed.
- F3-546 The commenter states that SCE did not create Figure E-2a thru E-2d in Section E (Cumulative Scenario and Impacts) and requests that the source identified on the figures be revised to Aspen, 2015. The commenter further notes that in some instances the figures improperly reflect minimum distances required between structures of other voltages and reflect use of TSPs when LSTs may be more appropriate.
- The commenter is mistaken, as SCE is the source of the images shown in Figure E-2a thru E-2d. Many figures throughout the EIS identify SCE as the source. Throughout the EIS, the EIS preparers assembled and formatted SCE-provided information to create a final figure, based on background information and basic images from SCE. The basic illustrations of structures used in these figures were originally from SCE and assembled by the EIS team. The description of the Cumulative Transmission Scenario need not be revised, as it clearly describes what is only "likely" to occur, and it is presented only for the purpose of enabling an analysis of foreseeable cumulative impacts.
- F3-547 SCE requests that references to estimated daily emissions for construction activities at the Timoteo and Tennessee Substations be removed from the table since this work is no longer needed as part of the Proposed Project. The table referenced in the comment is from page E-46 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-44). Because the table in the appendix was included as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.
- F3-548 Reference to the Tennessee and Timoteo Substations has been removed from the Project Description and from the construction emissions table (Table D.3-8). This comment references page E-46 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-44). Because the table in the appendix was included as it was shown in the PEA, it has not been updated as a result of this comment. A table with similar information appears in Section D.3 (Air Quality) as Table D.3-8, which was edited in response to a previous com-

ment removing the substations. All comments requesting deletion of the substations in the EIS text have been addressed. For example, see Responses to Comments F3-335 and F3-579.

- F3-549 SCE believes that simulations for the cumulative scenario's future 500 kV transmission line should not be presented in the EIS because they give the impression that SCE has specific plans for future development in the corridor. Nothing in the description of the cumulative scenario states or implies that SCE has specific plans for transmission expansion within the WOD Corridor. In fact, Section E.2.3.1 of the Draft EIR/EIS specifically stated, "While SCE states that it currently has no specific plans for transmission expansion in the WOD corridor, there are other regional studies that point to the potential for future development." Note that a similar simulation of the cumulative scenario was presented in the EIR/EIS for the Devers-Palo Verde No. 2 Transmission Project.

Visual photo-simulations are often prepared to provide the public and decision-makers with an image of potential future infrastructure. This simulation is based on an existing 500 kV transmission line on tubular steel poles, and is considered to be accurate for the purposes of the EIS assessment of potential cumulative impacts.

- F3-550 SCE states that it did not provide the 500 kV corridor profiles for a simulation shown in Figure E-3a in the cumulative analysis of visual resources. First, Figure E-3a is not a simulation but simply a photograph of the existing corridor. Second, neither Figure E-3a nor Figure E-3b state SCE as a source for the photograph.

- F3-551 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section E.3.21 (Cumulative Scenario and Impacts, Electrical Interference and Safety). See Response to Comment F3-492.

- F3-552 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to qualify the discussion and add "potential" or "could" to the discussion in Section E.3.21 (Cumulative Scenario and Impacts, Electrical Interference and Safety). See Response to Comment F3-492.

- F3-553 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to qualify the discussion and add "potential" or "could" to the discussion in Section E.3.21 (Cumulative Scenario and Impacts, Electrical Interference and Safety). See Response to Comment F3-492.

- F3-554 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to qualify the discussion and add "potential" or "could" to the discussion in Section E.3.21 (Cumulative Scenario and Impacts, Electrical Interference and Safety). See Response to Comment F3-492.

- F3-555 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.



## Comment Set F3: Southern California Edison Company (cont.)

### Section F Other NEPA Considerations

#### Page F-7

##### DEIR/DEIS Text:

##### Cultural Resources

- Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

##### SCE Comment:

This section is listed under the section “Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented.” The analysis in this section conflicts with the analysis in Section D.7. Section D.7 does not find cultural impacts to be significant and unavoidable, therefore, this discussion should be deleted from this section.

F3-556

#### Page F-7

##### DEIR/DEIS Text:

##### Cultural Resources

- Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains.

##### SCE Comment:

The DEIR/DEIS incorrectly assumes adverse impacts. SCE recommends the following edits:

##### Cultural Resources

- Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains.

F3-557

#### Page F-8

##### DEIR/DEIS Text:

##### Visual Resources

- Impact VR-2: Construction would result in visual contrast due to vegetation removal.
- Impact VR-9: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality.

##### SCE Comment:

Evidence has not been presented to support the conclusion that these impacts is significant and unavoidable nor has evidence been provided to support the conclusion that mitigation would not reduce the impact to less than significant levels. These impacts should be changed from Class I to Class II.

F3-558

### Responses to Comment Set F3 – Section F Other NEPA Considerations

- F3-556 The comment incorrectly states that Impact CL-2 in D.7 Cultural Resources is not found to be a significant and unavoidable impact (Class I). This comment relates to CEQA, not NEPA. As explained in CPUC's Final EIR, Section D.7.3.5 under Impact CL-2, this impact is found to be significant. No change is required.
- F3-557 The language change requested (from "would" to "could" has been made in Section C.7 (Cultural Resources) .
- F3-558 The commenter asserts that no evidence has been provided that supports the conclusion that construction would result in visual contrast due to vegetation removal (Impact VR-2). This conclusion is considered reasonable and what would be expected from construction activities in semi-arid and arid environments where vegetation recovery is difficult and often takes many years, often never achieving full recovery. Furthermore, this conclusion is based on several decades of observing the effects of construction of similar projects in similar environments and consulting with lead and responsible agencies tasked with the review and evaluation of such projects. Therefore, no changes to the impact conclusion have been made.

The commenter also asserts that evidence has not been provided to support the conclusion that the long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Impact VR-8) and result in significant visual impacts. The determination of the level of significance of an impact is a CEQA consideration, and not addressed under NEPA. As CPUC discusses in its Final EIR, the discussion of Impact VR-8 states that in the majority of cases, Impact VR-8 would result in either Adverse but Less Than Significant or Beneficial (Class IV) visual impacts. In a very few instances it has been determined that Impact VR-8 would cause Significant and Unavoidable (Class I) visual impacts. Throughout the Final EIS impact analysis, visual simulations have been presented to document the representative visual impacts that would occur with project implementation. Therefore, no additional information is considered necessary and no changes to the impact conclusion have been made.

## Comment Set F3: Southern California Edison Company (cont.)

## Section G Comparison of Alternatives

## Page G-6

## DEIR/DEIS Text:

The Proposed Project in would have 4 significant (Class I) impacts for the 66 kV subtransmission line component. The first 3 impacts would occur for all proposed or alternative segments, but Impact VR-8 results specifically from the 1,600 feet of proposed overhead 66 kV subtransmission along Iowa Street in the City of Redlands. The Iowa Street 66 kV Underground Alternative would mitigate Impact VR-8 to less than significant levels.

## SCE Comment:

SCE's comments to the Visual Resources section of the DEIR/DEIS indicated that Figure D-18-25B improperly simulates the installation of double-circuit 220kV TSPs (with a typical as shown in Figure B-10), instead of the correct use of single-circuit 66 kV wood poles (with typical as shown in Figure B-14b). If this simulation had incorporated the correct structure type, it would show that the Proposed Project creates a similar visual impact as the "single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street" and the "...vertical street light poles and a more distant communication tower." (See DEIR page D.18-24, KOP-18, Visual Quality.), therefore the significant impact would not warrant the need for the underground alternative as there would be no impact to mitigate. As such the comparison of this underground alternative to the Proposed Project, as seen in Table G-3, indicates that if not for the incorrect conclusion that this alternative was preferred for visual the Proposed Project is preferred for all other resource areas and, therefore, this alternative should be deleted from further consideration and/or Table G-2 should incorporate the following revisions.

Issue Area	Proposed Project	Iowa 66 kV Underground Alternative
Climate Change	No preference	No preference
	Preferred	Greater construction impacts due to need for trenching
Visual Resources	Significant and unmitigable long-term visual impacts from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands	Preferred Elimination of overhead segment in residential neighborhood reduces long-term impact to less than significant levels
	No preference	No Preference

## Page G-5

## DEIR/DEIS Text:

Table G-2. Comparison of the Proposed Project to Tower Relocation

Land Use and BLM Realty	Greater disturbance of sensitive receptors (residences) during both construction and operation	Preferred Even though construction timeframe would be longer
-------------------------	--	---

## SCE Comment:

Both the Proposed Project and the Tower Relocation Alternative result in Class II impacts. The Comparison states that the Proposed Project disturbance would be greater during both construction and operation. However, when compared to the tower relocation alternative, the construction timeframe would be longer for that alternative. The analysis does not support that the Tower Relocation Alternative would be preferred; therefore, the text should be modified to reflect no preference:

Land Use and BLM Realty	Greater disturbance of sensitive receptors (residences) during both construction and operation	Preferred Even though construction timeframe would be longer
	No preference	No Preference



### Comment Set F3: Southern California Edison Company (cont.)

Page G-6

DEIR/DEIS Text:

Table G-2. Comparison of the Proposed Project to Tower Relocation

Visual Resources	Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation	<b>Preferred:</b> Visual impacts less than significant due to greater distance of towers from residences
------------------	---	--

SCE Comment:

A decrease in visual impacts for the Tower Relocation Alternative has not been demonstrated by the DEIR/DEIS analysis, especially as the alternative does not include any visual simulations, nor is there a basis for concluding that this slight shift in structure location would be perceptible, therefore the text should be modified to reflect no preference.

Visual Resources	<del>Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation</del> <u>No preference</u>	<del><b>Preferred:</b> Visual impacts less than significant due to greater distance of towers from residences</del> <u>No preference</u>
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Page G-8

DEIR/DEIS Text:

#### G.4.3 Phased Build Alternative

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's characterization of optional future phases to the WOD Upgrade Project. The concerns raised in the accompanying cover letter demonstrate that the analysis included in this section comparing the Phased Build Alternative to the Proposed Project is deficient and conclusions related to the Phase Build Alternative being preferred to the Proposed Project are unsubstantiated.

F3-561

F3-562

## Comment Set F3: Southern California Edison Company (cont.)

### Pages G-8 through G-9

#### DEIR/DEIS Text:

##### G.4.3 Phased Build Alternative

#### SCE Comment:

Table G-4 of the Draft EIR/EIS identifies the Phased Build Alternative as the preferred alternative for the following resource areas:

- Air Quality
  - Cultural Resources
  - Geology and Soils
  - Land Use and BLM Realty
  - Noise
  - Paleontological Resources
  - Transportation and Traffic
  - Visual Resources
- Water Resources and Hydrology.

The Draft EIR/EIS, though, fails to adequately describe all the construction features for the Phased Build Alternative that if taken into account would likely lead to minimal differences for these resource areas. Moreover, impacts for these resource areas would only be potentially less than the Proposed Project because the full environmental impacts of the Phased Build Alternative were not evaluated, including additional ground disturbance that would be required to avoid construction work area constraints due to the presence of the adjacent towers that would not be removed.

Please see SCE's accompanying cover letter demonstrating that the analysis included in this section comparing the Phased Build Alternative to the Proposed Project is deficient and conclusions related to the Phase Build Alternative being preferred to the Proposed Project are unsubstantiated.

F3-563

### Pages G-8 through G-9

#### DEIR/DEIS Text:

##### G.4.3 Phased Build Alternative

#### SCE Comment:

Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed:

##### Air Quality

The future portion of the Phased Build Alternative will require construction activities to occur throughout the entire WOD ROW. These construction activities will generate dust and exhaust emissions of criteria pollutants and toxic air contaminants in a quantity roughly equal to that estimated for the Alternative. Conservatively, it is likely that construction-related air quality impacts for the Phased Build Alternative plus the future portion of the Phased Build Alternative will be greater than the air quality impacts for the Proposed Project (e.g., fugitive dust related to greater areas of ground disturbance under the Phase Build Alternative).

##### Cultural Resources

The Draft EIR/EIS assumes that because one set of transmission structures is not removed for the Phased Build Alternative that the Alternative would result in reduced impacts to buried prehistoric and historical archaeological sites or buried Native American human remains compared to the Proposed Project. However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line as well as additional ground disturbance due to construction work area constraints, the perceived reduction in impacts to cultural resources for the Phased Build Alternative is merely a deferral of potential impacts. Because both 220kV transmission lines are ultimately rebuilt under the Phased Build Alternative, the full impact to Cultural Resources is equivalent to or greater than those for the Proposed Project.

F3-564

**Comment Set F3: Southern California Edison Company (cont.)**

Pages G-8 through G-9

DEIR/DEIS Text:

**G.4.3 Phased Build Alternative**

**SCE Comment:**

Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed (cont):

**Geology and Soils**

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Geology and Soils are less for that alternative than for the Proposed Project. However, because the future portion of the Phased Build Alternative will require construction activities through the entire WOD ROW, including removal and construction of transmission structures in Segments 1, 2, 3, 4, and 6 and greater ground disturbance due to constrained work area, the full impacts related to Geology and Soils for the Phased Build Alternative are equivalent to or greater than those for the Proposed Project.

**Land Use and BLM Realty**

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Land Use and BLM Realty are less for that alternative than for the Proposed Project. However, because the future portion of the Phased Build Alternative will require construction activities through the entire WOD ROW, including removal and construction of transmission structures in Segments 1, 2, 3, 4, and 6 and greater ground disturbance due to constrained work area, the full impacts related to Land Use and BLM Realty for the Phased Build Alternative are at least equivalent to those for the Proposed Project. In fact, because the Phased Build Alternative would require that SCE cross tribal land to remove conductor from the reused transmission structures and again to reconnector the new transmission structures, there is the potential for Land Use and BLM Realty impacts from the full Phased Build Alternative to be greater than the impacts from the Proposed Project

F3-565

**Comment Set F3: Southern California Edison Company (cont.)**

**Pages G-8 through G-9**

**DEIR/DEIS Text:**

**G.4.3 Phased Build Alternative**

**SCE Comment:**

Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed (cont):

**Noise**

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Noise are less for that alternative than for the Proposed Project. While it may be possible that noise impacts for the immediate portion of the Phased Build Alternative are less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW that would result in similar impacts being experienced by sensitive receptors for a second time.

**Paleontological Resources**

The Draft EIR/EIS assumes that because one set of transmission structures is not removed for the Phased Build Alternative that the Alternative would result in reduced impacts to paleontological resources compared to the Proposed Project. However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line, the perceived reduction in impacts to paleontological resources for the Phased Build Alternative is merely a deferral of potential impacts. Because both 220 kV transmission lines are ultimately rebuilt under the Phased Build Alternative, the full impact to Paleontological Resources is equivalent to or greater than those for the Proposed Project because of the additional ground disturbance required to address constrained work area.

**Transportation and Traffic**

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Transportation and Traffic are less for the Alternative than for the Proposed Project. While it may be possible that traffic impacts for the immediate portion of the Phased Build Alternative are less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW that would result in similar impacts occurring again in as little as 10 years.

F3-566

## Comment Set F3: Southern California Edison Company (cont.)

Pages G-8 through G-9

### DEIR/DEIS Text:

#### G.4.3 Phased Build Alternative

F3-567

#### SCE Comment:

Relative to those resources for which the DEIR/DEIS finds the Phased Build Alternative to be Preferred, the following should be addressed (cont):

##### Visual Resources

The Draft EIR/EIS states that impacts to visual resources for the Phased Build Alternative would be “less than significant due to greater distances of towers from residences,” compared to “significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation for the Proposed Project.” However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line, the perceived reduction in impacts to visual resources for the Phased Build Alternative is primarily a deferral of potential impacts. Sensitive receptors of the WOD ROW would experience visual impacts related to construction twice – once for initial construction of the Phased Build Alternative and again for the future construction of the Phased Build Alternative.

##### Water Resources

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Water Resources and Hydrology are less for that alternative than for the Proposed Project, presumably because less water is needed for construction activities under the Phased Build Alternative. While it may be possible that water needs for the immediate portion of the Phased Build Alternative is less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW for a second time. Additionally, greater ground disturbance would be necessary to address work area constraints during construction. Conservatively, it is likely that construction-related water needs for the Phased Build Alternative plus the construction-related water needs for the future portion of the Phased Build Alternative would be greater than the construction-related water needs for the Proposed Project.

##### Other Resource Areas

Generally, the same assessment that applies to the resource areas identified above applies to the remainder of the resource areas analyzed in the Draft EIR/EIS.

Comment Set F3: Southern California Edison Company (cont.)

Page G-9

DEIR/DEIS Text:

The Phased Build Alternative is preferred over the Proposed Project because it would mitigate operational impacts (visual presence of the Proposed Project closer to the south edge of the ROW in Segments 4 and 6 and from the 66 kV line along Iowa Street) to less than significant levels.

Table G-4. Comparison of the Proposed Project to Phased Build Alternative

	No preference	No preference
Visual Resources	Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation	<b>Preferred</b> Visual impacts less than significant due to greater distance of towers from residences and elimination

SCE Comment:

The document should indicate no preference between the Phased Build Alternative and the Proposed Project with respect to visual resources. As such, please make the following revisions:

The Phased Build Alternative is not preferred for visual reasons

Table G-4. Comparison of the Proposed Project to Phased Build Alternative

	No preference	No preference
Visual Resources	Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation	<b>Preferred</b> Visual impacts less than significant due to greater distance of towers from residences and elimination
	No preference	No preference

F3-568

### Responses to Comment Set F3 – Section G Comparison of Alternatives

- F3-559 Please see Response to Comment F3-441 regarding the revised simulation of the proposed new lowa Street 66 kV line. Level of impact significance is a CEQA consideration, and not a NEPA consideration. As CPUC notes in its Final EIR, the revised simulation showed that the visual impact would remain significant and unavoidable, and no change has been made to Table G-3 for visual resources.
- F3-560 SCE states that the construction timeframe would be longer for the Tower Relocation Alternative than for the Proposed Project, so Table G-2 should be modified. The table has not been modified, because the EIS conclusion more heavily weighs the long-term visual impact (presence of the larger tower, closer to residences) than the short-term construction impact.
- F3-561 The text in the Visual Resources section (D.18.4.1, Tower Relocation Alternative) has been expanded to more clearly explain why this alternative presents a visual benefit in comparison with the Proposed Project. As a result, the Comparison of Alternatives (Table G-2) has not been modified as requested by SCE.
- F3-562 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) and Response to Comment F1-13 regarding the impacts of the Phased Build Alternative.
- F3-563 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.
- F3-564 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) regarding SCE's statement that the EIS inadequately considers air quality and cultural resources impacts of this alternative.
- F3-565 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) regarding SCE's statement that the EIS inadequately considers geology/soils and land use impacts of this alternative.
- F3-566 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) regarding SCE's statement that the EIS inadequately considers paleontology and transportation/traffic impacts of this alternative.
- F3-567 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) regarding SCE's statement that the EIS inadequately considers water resources and other resource areas for this alternative.
- F3-568 Please see Response to Comment F3-561 regarding the Tower Relocation Alternative. The response to that comment also applies to this comment about the Phased Build Alternative.



## Comment Set F3: Southern California Edison Company (cont.)

### Section H Mitigation Monitoring and Reporting

#### Page H-3

##### DEIR/DEIS Text:

When a mitigation measure requires that a study or plan be developed during the design or pre-construction phase of the project, SCE must submit the final study or plan to CPUC and BLM for review and approval. Any study or plan that requires approval of the CPUC and BLM must allow at least 60 days for adequate review. Other agencies and jurisdictions with authority over aspects of the project or particular resources may require additional review time. It would be the responsibility of the CPUC/BLM environmental monitoring team to confirm that appropriate opportunities for agency reviews have occurred and required approvals obtained.

##### SCE Comment:

Review time may be more or less than that referenced, depending on the complexity of a given plan. As such, please make the following revisions:

When a mitigation measure requires that a study or plan be developed during the design or pre-construction phase of the project, SCE must submit the final study or plan to CPUC and BLM for review and approval. Any study or plan that requires approval of the CPUC and BLM must allow at least 60 days adequate time for adequate review. Other agencies and jurisdictions with authority over aspects of the project or particular resources may require additional review time. It would be the responsibility of the CPUC/BLM environmental monitoring team to confirm that appropriate opportunities for agency reviews have occurred and required approvals obtained.

#### Pages H.3 through H-4

##### DEIR/DEIS Text:

If a project change would create or have the potential to create a new significant impact, increase the severity of an impact, or occur outside the geographic area evaluated in the EIR/EIS, the Applicant would be required to submit a PFM.

##### SCE Comment:

To clarify that minor project additions (e.g. a new construction yard) that would not result in significant impacts would not require a PFM, please make the following revisions:

If a project change would create or have the potential to create a new significant impact or, increase the severity of an impact, ~~or occur outside the geographic area evaluated in the EIR/EIS~~, the Applicant would be required to submit a PFM.

#### Page H-5

##### DEIR/DEIS Text:

**Step 1.** Disputes and complaints (including those from the public) should be directed first to the CPUC and/or BLM's Project Manager or designee, as appropriate, for resolution. The Project Manager or designee would attempt to resolve the dispute.

##### SCE Comment:

To ensure consistency between the Dispute Resolution procedures and Mitigation Measure "LU-1a Prepare construction notification plan". Per "LU-1a Prepare construction notification plan", the following edits are suggested:

**Step 1.** Disputes and complaints (including those from the public) should be directed first to SCE, to the CPUC and/or BLM's Project Manager or designee, as appropriate, for resolution. ~~The Project Manager or designee would attempt to resolve the dispute. SCE will attempt to resolve the dispute. If the dispute or complaint is resolved by SCE no further action or escalation is needed. If SCE is not able to resolve a dispute or complaint, SCE will direct those to the CPUC and/or BLM's Project Manager or designee, as appropriate, for resolution.~~

F3-569

F3-570

F3-571

### Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page H-6

**DEIR/DEIS Text:**

Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.

**SCE Comment:**

SCE contracts for construction require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and lastly, construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please make the following edits:

Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. ~~Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.~~

F3-572

Page H-6

**DEIR/DEIS Text:**

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports would be made available for public inspection by the CPUC and BLM on request. The CPUC, the BLM, and SCE would develop a filing and tracking system

**SCE Comment:**

To clarify that this does not require additional reporting by SCE, please make the following revision:

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports prepared by the CPUC and BLM, or officially transmitted to the CPUC and BLM by SCE, would be made available for public inspection by the CPUC and BLM on request. The CPUC, the BLM, and SCE would develop a filing and tracking system.

F3-573

### Responses to Comment Set F3 – Section H Mitigation Monitoring and Reporting

- F3-569 The commenter states that review time of studies or plans may be more or less than that referenced in Section H.3 (Mitigation Monitoring and Reporting, Roles and Responsibilities), depending on the complexity of a given plan. The commenter requests that the text is modified to remove “at least 60 days” and replace it with “adequate time for review” by the CPUC and BLM. To retain consistency in this standard review timeframe, this suggested change has not been made. SCE is in control of the construction schedule and can submit plans or studies to the CPUC and BLM a month or two earlier, if it believes that review timeframe could affect the start of construction.
- F3-570 The commenter requests text revisions in Section H.3 (Roles and Responsibilities) to state that minor project additions (e.g., new construction yard) that would not result in significant impacts would not require a Petition For Modification (PFM). This is a CPUC issue and is addressed in the Final EIR.
- F3-571 The commenter requests text clarification in Section H.4 (Mitigation Monitoring and Reporting, Dispute Resolution) to ensure consistency between the dispute resolution procedures and Mitigation Measure LU-1a (Prepare construction notification plan). The discussion in Section H.4 (Dispute Resolution) is intended to primarily apply to disputes between the CPUC, BLM and SCE. Therefore, the CPUC and/or BLM’s Project Manager or designee would be the appropriate person to first attempt to resolve the dispute, and no change has been made to this text in the EIS. However, to insure that public dispute resolution would be consistent with Mitigation Measure LU-1a (Prepare construction notification plan), clarifying text has been added to the Final EIS in Section H.4, under Step 1.
- F3-572 The commenter states that SCE contracts for construction require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and lastly, construction is monitored to ensure that measures are complied with. The additional text requirement in Section H.5.2 (Mitigation Monitoring and Reporting, Construction Personnel) of the EIS is thus unnecessary and should be deleted.
- A signed agreement by construction subcontractors to adhere to procedures, including APMs and mitigation measures, is an important step to confirm that the specific requirements are not only known, but will be followed to ensure the protection of resources. However, this agreement does not necessary have to be an additional requirement between the construction contractor and SCE. Therefore, the word “separate” has been removed from the text in Section H.5.2 in the Final EIS.
- F3-573 The commenter requests clarification in Section H.5.4 (Mitigation Monitoring and Reporting, Public Access to Records) of the EIS to clarify that public access to records and reports used to track the monitoring program does not require additional reporting by SCE. The clarification has been made to the Final EIS.

## Comment Set F3: Southern California Edison Company (cont.)

### Appendix 1 Project Description Information

#### Pages Ap. Various Pages

**DEIR/DEIS Text:**

Table Ap.1A-1. Structure Heights

F3-574

**SCE Comment:**

Please see attached file "WODUP\_TableAp 1A-X\_StructureHeights\_Rev A09-11-15.xls" for updates to Appendix 1 structure heights (all segments)

#### Pages Ap. Various Pages

**DEIR/DEIS Text:**

Appendix 1B FAA Hazard Marking Evaluation

F3-575

**SCE Comment:**

Please see attached file "WODUP\_Appendix 1B\_FAA Hazard Marking Evaluation\_Rev.xls" (all segments)

#### Pages Ap. Various

**DEIR/DEIS Text:**

Table Ap.18-2. Preliminary FAA Evaluation

F3-576

**SCE Comment:**

Please see attached file "WODUP\_Prelim FAA Determination\_Rev.xls" (all segments)

Comment Set F3: Southern California Edison Company (cont.)

Pages Ap.1C-3 through 4

DEIR/DEIS Text:

Tennessee Substation					
<i>Civil</i>					
			3-4		
¾-Ton Crew Cab 4×4	275	Gas	1	4	2
Dump Trucks	350	Diesel	1	2	4
Backhoe	125	Diesel	1	2	6
<i>Electrical</i>					
			5		
Manlifts Bucket Truck	250	Diesel	1	10	6
Boom/ Crane Truck	180	Diesel	1	3	4
¾-Ton Crew Cab 4×4	275	Gas	1	14	2
<i>Maintenance</i>					
			4		
Checker Truck	180	Gas Diesel	1	14	2
¾-Ton Crew Cab 4×4	275	Gas	1	2	2
Gas Processing Trailer	0	Electric	1	1	6
<i>Test</i>					
			2		
Utility Truck	180	Gas	1	8	2

SCE Comment:

Please remove the following references to the Tennessee Substation:

Tennessee Substation					
<i>Civil</i>					
			3-4		
¾-Ton Crew Cab 4×4	275	Gas	1	4	2
Dump Trucks	350	Diesel	1	2	4
Backhoe	125	Diesel	1	2	6
<i>Electrical</i>					
			5		
Manlifts Bucket Truck	250	Diesel	1	10	6
Boom/ Crane Truck	180	Diesel	1	3	4
¾-Ton Crew Cab 4×4	275	Gas	1	14	2
<i>Maintenance</i>					
			4		
Checker Truck	180	Gas Diesel	1	14	2
¾-Ton Crew Cab 4×4	275	Gas	1	2	2
Gas Processing Trailer	0	Electric	1	1	6
<i>Test</i>					
			2		
Utility Truck	180	Gas	1	8	2

F3-577

Comment Set F3: Southern California Edison Company (cont.)

Page Ap.1C-4

DEIR/DEIS Text:

Timoteo Substation						
<i>Civil</i>				3-8		
Auger Truck	210	Diesel	1	2	66	44
¾-Ton Crew Cab 4x4	275	Gas	1		8	2
Boom Crane Truck	180	Diesel	1	2	66	44
Dump Trucks	350	Diesel	1	1	4	4
Backhoe	125	Diesel	1		4	6
Forklift	75	Diesel	1		88	44
Ditch Digger	75	Diesel	1		55	66
<i>Electrical</i>				7-10		
Manlifts Bucket Truck	250	Diesel	1		20	6
Boom Crane Truck	180	Diesel	1	2	6	4
¾-Ton Crew Cab 4x4	275	Gas	1		25	2
Ditch Digger	75	Diesel	1	1	10	66
Forklift	75	Diesel	1		10	4
<i>Maintenance</i>				3		
Checker Truck	180	Gas Diesel	1		25	2
¾-Ton Crew Cab 4x4	275	Gas	1		4	2
Gas Processing Trailer	0	Electric	1		2	6
<i>Test</i>				2		
Utility Truck	180	Gas	1		15	2

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Timoteo Substation						
<i>Civil</i>				3-8		
Auger Truck	210	Diesel	1	2	66	44
¾-Ton Crew Cab 4x4	275	Gas	1		8	2
Boom Crane Truck	180	Diesel	1	2	66	44
Dump Trucks	350	Diesel	1	1	4	4
Backhoe	125	Diesel	1		4	6
Forklift	75	Diesel	1		88	44
Ditch Digger	75	Diesel	1		55	66
<i>Electrical</i>				7-10		
Manlifts Bucket Truck	250	Diesel	1		20	6
Boom Crane Truck	180	Diesel	1	2	6	4
¾-Ton Crew Cab 4x4	275	Gas	1		25	2
Ditch Digger	75	Diesel	1	1	10	66
Forklift	75	Diesel	1		10	4
<i>Maintenance</i>				3		
Checker Truck	180	Gas Diesel	1		25	2
¾-Ton Crew Cab 4x4	275	Gas	1		4	2
Gas Processing Trailer	0	Electric	1		2	6
<i>Test</i>				2		
Utility Truck	180	Gas	1		15	2

F3-578

### Responses to Comment Set F3 – Appendix 1 Project Description Information

- F3-574 The commenter has provided an updated Table Ap.1A-1 (Structure Heights) from Appendix 1. See Response to Comment F4-6.
- F3-575 The commenter has provided an updated Table Ap.1B-1 (FAA Hazard Marking Evaluation) from Appendix 1. See Response to Comment F4-7.
- F3-576 The commenter has provided updated Tables Ap.1B-1 (FAA Hazard Marking Evaluation) from Appendix 1. See Response to Comment F4-8.
- F3-577 The commenter has requested references to work at the Tennessee Substation be removed since work on the substation is no longer needed as part of the Proposed Project. Therefore, Table Ap.1C-1 (Substation Construction Equipment and Workforce Estimates) in Appendix 1C (Construction Equipment and Workforce Estimates) of the Final EIS has been revised to delete the equipment and workforce information about Tennessee Substation.
- F3-578 The commenter has requested references to work at the Timoteo and Tennessee Substations be removed since it is no longer needed as part of the Proposed Project. Therefore, as requested, Table Ap.1C-1 (Substation Construction Equipment and Workforce Estimates) in Appendix 1C (Construction Equipment and Workforce Estimates) of the Final EIS has been revised to delete the equipment and workforce information about Timoteo and Tennessee Substations.



**Comment Set F3: Southern California Edison Company (cont.)**

**Appendix 5 Alternatives Screening Report**

Page Ap.5-3

**DEIR/DEIS Text:**

Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;

**SCE Comment:**

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

F3-579

## Comment Set F3: Southern California Edison Company (cont.)

Pages Ap.5-19 to Ap.5-42

### DEIR/DEIS Text:

#### 4.2 Tower Relocation Alternative

#### SCE Comment:

In several instances, the descriptions included Section 4.2 related to project objectives, feasibility, impacts and environmental advantages and disadvantages are inconsistent with information SCE submitted in response to several Energy Division data requests. SCE's concerns are noted below and SCE requests for this section to be updated based on these concerns.

In describing how this alternative would meet Basic Project Objective 2, the DEIR/DEIS errs by stating that the Tower Relocation Alternative could require a few additional months of construction and that this alternative would not affect California's meeting the RPS. As explained in SCE's responses to data requests ALT-15A and ALT-17D, this alternative would extend the overall project schedule by at least 12 months (as opposed to only a few months) and as indicated in the responses (attached to ALT-17D) received from generators, a delay beyond 2020 would adversely impact generation development. Impairment of generation development could affect utilities' ability to meet the State's RPS.

Regarding feasibility, the DEIR/DEIS does not adequately describe the potential legal and regulatory factors that could deem this alternative infeasible, including the contractual and legal obligations included in the SCE-Morongo agreements and the extended schedule. Regarding technical feasibility, the DEIR/DEIS omits information provided by SCE that explained how shifting structures 50 feet farther from residences in Segments 4 and 6 would not allow for the most efficient and safe working environment for the construction of these towers. While this alternative is not technically infeasible, the DEIR/DEIS should explain how this alternative is less safe to build than SCE's Proposed Project and how future projects in these areas would also be less safe construct as compared to SCE's Proposed Project. Regarding construction timeframe, the DEIR/DEIS should explain how this alternative will increase the project schedule by at least 12 months and how this delay could adversely impact generation development, consistent with SCE's responses to data requests ALT-15A and ALT-17D.

In describing the environmental advantages and disadvantages, the DEIR/DEIS overstates the environmental advantages and understates the environmental disadvantages for this alternative. There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts. Additionally, impacts related to construction disturbance including, for example, temporary visual impacts, air quality emissions, and noise would all be greater for the Tower Relocation Alternative than SCE's Proposed Project. As SCE explained in response to data request ALT-15A, the construction efforts necessary for relocating towers in Segments 4 and 6 would be significantly extended, because SCE would have to initially build the new southern tower line, string those two new circuits, and then return to the same areas again to perform similar construction activities, such as foundation construction, tower assembly and erection and line stringing, for the second (northern) tower line. Also, given that it would be more difficult to obtain the necessary double-line outages, it would be much more likely that installation of additional shoo-fly facilities would be necessary through these two Segments. As such, these activities would increase all construction-related impacts including, for example, temporary visual impacts, air quality emissions and noise for the Tower Relocation Alternative as compared to SCE's Proposed Project.

F3-580

**Comment Set F3: Southern California Edison Company (cont.)**

Pages Ap.5-46 to Ap.5-56

DEIR/DEIS Text:

4.4 Phased Build Alternative

SCE Comment:

Please see SCE's accompanying cover letter and attachments for concerns related to the Phased Build Alternative, more specifically, feasibility, and the ability for this alternative to meet project objectives, the increased environmental impacts, the increased schedule impact, and the increased costs.

F3-581

## Responses to Comment Set F3 – Appendix 5 Alternatives Screening Report

- F3-579 The commenter requests deletion of reference to Timoteo and Tennessee Substations, which are no longer part of the project. This change has been made in Appendix 5 (Alternatives Screening Report), Section 1.3, Summary of the Proposed Project.
- F3-580 The commenter identifies concerns regarding the description and analysis of the Tower Relocation Alternative (EIS Appendix 5, Section 4.2). The concerns are that the alternative: would add 12 months to the construction schedule, would adversely affect the ability to develop renewable energy; would not be consistent with obligations in SCE's agreement with the Morongo Tribe; and that construction may be less safe. The summary of environmental disadvantages and advantages shown in the Alternatives Screening Report (EIS Appendix 5) provides a general and high-level assessment of the alternative, for the purpose of determining whether it should be included in the EIS. The description and analysis in the Alternatives Screening Report clearly indicates that the Tower Relocation Alternative is potentially feasible, it substantially satisfies all three basic project objectives, and it would reduce or avoid certain environmental effects of the Proposed Project. Therefore, the EIS provides substantial evidence indicating that the alternative should be analyzed in the EIS.
- The information in Appendix 5 recognizes that the construction schedule could be extended beyond that of the Proposed Project. However, SCE's comment does not support an assertion that 12 months would be added. Throughout the EIS, the project description and impact analysis recognize that *"Specific structure type, foundation type, quantities, height, and spacing would be determined upon final engineering, and would be constructed in compliance with CPUC General Order 95"* (as in Section B.2.1.2, Transmission Line Infrastructure). Since structure "spacing" would be determined by SCE upon final engineering, this alternative, which changes spacing, should not result in any notable change in the engineering schedule.
- Contrary to the assertion of the comment, the alternative would need to be constructed in a safe manner and in compliance with BLM and CPUC provisions and all applicable codes, just as the project would be. The individual chapters for each environmental topic in Section D provide substantial evidence in the comparison of impacts from this alternative with those of the Proposed Project. See also Response to Comment F3-410 for more detail and evidence to support the EIS conclusions on visual impacts.
- F3-581 Please see Responses to Comments F1-5 through F1-20 regarding SCE's concerns about the Phased Build Alternative.

**Comment Set F3: Southern California Edison Company (cont.)**

## Appendix 6 Air Quality

Page Ap.6-1

**DEIR/DEIS Text:**

F3-582

### Modifications to Existing Substations (Upgrades)

### Substation Cut/Fill Grading and Surface Improvements

Substation	Task	Materials
Approximate	Surface Area (sqft)	Approximate volume (cuyd)
	Substation equipment foundations, cut	Concrete Acres
	1.109	108
	0.1	
Devers Substation	Substation eq	Concr 931
	Site Fill	Soil 177
	Site Cut	Soil -
El Casco	Substation	Concr 770
	Substation	Concr 910
	Site Cut	Soil 140
Vista	Substation	Concr 1.109
	Substation eq	Concr 931
	Site Fill	Soil 125
San	Substation eq	Concr 2.797
	Substation eq	Concr 1.558
	Site Fill	Soil 1.239
Timoteo	Substation	Concr 68
	Substation	Concr 60
	Site Fill	Soil 8
Tennessee	Substation	Concr 25
	Substation	Concr 30
	Site Cut	Soil 5

**SCE Comment:**

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Devers Substation	Substation Site Fill	Concrete Soil	931 177	199 -	PM10/day PM2.5/day	0.5 0.1
El Casco	Substation Site Cut	Concrete Soil	770 910 140	43 51 8	Acres PM10/day PM2.5/day	0.0 0.4 0.1
	Substation Site Fill	Concrete Soil	1109 931 125	108 199 -	Acres PM10/day PM2.5/day	0.0 0.5 0.1
	Substation Site Fill	Concrete Soil	1558 1239	322 255 57	Acres PM10/day PM2.5/day	0.1 1.3 0.3
Timotee	Substation Site Fill	Concrete Soil	65 60 8	4 2 1	Acres PM10/day PM2.5/day	0.0 0.0 0.0
	Substation Site Cut	Concrete Soil	25 30 3	2 2	Acres PM10/day PM2.5/day	0.0 0.0 0.0
	Substation Site Cut	Concrete Soil	25 30 3	2 2	Acres PM10/day PM2.5/day	0.0 0.0 0.0

**Comment Set F3: Southern California Edison Company (cont.)**

Page Ap.6-5

**DEIR/DEIS Text:**

Modifications to Existing Substations (Upgrades)

*Construction Equipment and Workforce Estimates*

**SCE Comment:**

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

F3-583

Comment Set F3: Southern California Edison Company (cont.)

Page Ap.6-44

DEIR/DEIS Text:

Total Construction Emissions

F3-584

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.6	0.1	0.0
Tennessee Substation	2.2	0.1	0.6	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.5	0.1	0.0
Tennessee Substation	2.2	0.1	0.5	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

SCE Comment:

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.



Comment Set F3: Southern California Edison Company (cont.)

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	7.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Enwanda Substation	1.0	0.0	0.1	0.0	0.0
<del>Timoteo Substation</del>	<del>2.2</del>	<del>0.1</del>	<del>0.6</del>	<del>0.1</del>	<del>0.0</del>
<del>Tennessee Substation</del>	<del>2.2</del>	<del>0.1</del>	<del>0.6</del>	<del>0.0</del>	<del>0.0</del>
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	7.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Enwanda Substation	1.0	0.0	0.1	0.0	0.0
<del>Timoteo Substation</del>	<del>2.2</del>	<del>0.1</del>	<del>0.5</del>	<del>0.1</del>	<del>0.0</del>
<del>Tennessee Substation</del>	<del>2.2</del>	<del>0.1</del>	<del>0.5</del>	<del>0.0</del>	<del>0.0</del>
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

F3-584  
cont.

**Comment Set F3: Southern California Edison Company (cont.)**

Page Ap.6-45

**DEIR/DEIS Text:**

Activity

Substations

Devers Substation Peak Phase

El Casco Substation Peak Phase

Vista Substation Peak Phase

San Bernardino Substation Peak Phase

Etiwanda Substation Peak Phase

Timoteo Substation Peak Phase

Tennessee Substation Peak Phase

**SCE Comment:**

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Activity

Substations

Devers Substation Peak Phase

El Casco Substation Peak Phase

Vista Substation Peak Phase

San Bernardino Substation Peak Phase

Etiwanda Substation Peak Phase

~~Timoteo Substation Peak Phase~~

~~Tennessee Substation Peak Phase~~

F3-585

### Responses to Comment Set F3 – Appendix 6 Air Quality

- F3-582 SCE requests that references to the *Substation Cut/Fill Grading and Surface Improvements* at the Timoteo and Tennessee Substations be removed from the table since this work is no longer needed as part of the Proposed Project. The table referenced in the comment is from page E-3 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-1). Because the table in the appendix was included as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.
- F3-583 SCE requests that references to the *Construction Equipment and Workforce Estimates* for the Timoteo and Tennessee Substations be removed from the table since this work is no longer needed as part of the Proposed Project. The table referenced in the comment is from page E-7 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-5). Because the table in the appendix was included as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.
- F3-584 SCE requests that references to estimated daily emissions for construction activities at the Timoteo and Tennessee Substations be removed from the table since this work is no longer needed as part of the Proposed Project. The table referenced in the comment is from page E-46 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-44). Because the table was included in the appendix as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.
- F3-585 SCE requests that references to the Localized Significant Threshold Analysis for activities at the Timoteo and Tennessee Substations be removed from the list since this work is no longer needed as part of the Proposed Project. The list referenced in the comment is from page E-47 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-45). Because the list was included in the appendix as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.

## Comment Set F3: Southern California Edison Company (cont.)

### Appendix 7 Biological Resources

#### Page Ap.7-1

##### DEIR/DEIS Text:

##### Appendix 7: Tables of Special Status Plants and Wildlife

Table Ap.7-1 and Table Ap.7-2 list the conservation status and habitat descriptions of special-status plant and wildlife species known from or potentially occurring in the Project Study Area. For species not observed during surveys, the potential for their occurrence was determined by biologists knowledgeable about each species based on the species' habitat requirements, range (including elevation), and previously recorded observations within the region.

The following criteria were used to determine the potential for each species to occur along the Proposed Project route:

- **Present:** Species was observed within the Project Study Area during biological surveys.
- **High:** Suitable habitat is present and there is a documented occurrence of the species within the proposed route or its vicinity (approximately five miles).
- **Moderate:** Either suitable habitat is present, or there is a documented occurrence of the species within the vicinity of the proposed route (approximately five miles).
- **Low:** No documented occurrences of the species exist within the proposed route or vicinity (approximately five miles) or no marginally suitable habitat is present along the route, or both.
- **Not Likely to Occur:** Species was not observed during field surveys, no documented occurrences along the route, and the species is restricted to habitat conditions that do not occur along the proposed route.

Habitat conditions include soil type, elevation range, vegetation, and other factors relevant to each species. The criteria are general guidelines and a species' potential for occurrence may be modified based on biological analysis of habitat quality, isolation, and other factors.

##### SCE Comment:

These criteria are not found in the Bio sections for Veg and Wildlife. At a minimum, it is recommended that these criteria be inserted in the text in both the Vegetation and Wildlife Sections to allow readers to understand how the terms are used in the document.

The definitions presented in the DEIR/EIS are not entirely consistent with these terms as they were applied in the PEA and can sometimes result in misleading conclusions that indicate several species have high or moderate potential to occur when the available information indicates that such occurrence would be unlikely. For example, there are no records of California gnatcatcher anywhere in Segment 4 and the limited habitat that is present occurs at elevations above where this species normally is found (99% of occurrences area below 2,000'), but the DEIR/DEIS states that this species has a moderate potential to occur in this segment.

In defining the "high potential to occur" the meaning of the phrase "documented occurrence within the proposed route" is unclear. Presumably, "study area" is what was intended. Also, for species with very specific habitat requirements, it should be recognized that using the term "high potential to occur" may be misleading if the study area doesn't actually contain the habitat constituents or if it is not within the species elevational range. For such species, attributing a "high potential to occur" because of documentation within five miles seems excessive and could be misleading.

The definition of "moderate" is also confusing and may easily be misunderstood by readers. It indicates that a species is considered to have a "moderate potential to occur" even if suitable habitat is lacking by using the "either suitable habitat is present or documented occurrence within 5 miles" definition. First, if suitable habitat is absent within the project work areas or immediately adjacent areas, then the definition of "low potential" as it is defined here would apply (i.e., "no marginally suitable habitat is present"). However, it seems misleading to attribute anything more than a low potential or "not expected" for any species for which their habitat requirements are absent from the project study area, regardless of whether there are records documenting occurrence up to five miles away.

The definition of "low potential to occur" is likewise confusing as it seems to overlap the definition of "not likely to occur." It seems reasonable to assume there could be some potential for a species to occur whether or not

F3-586

### Comment Set F3: Southern California Edison Company (cont.)

there are any documented occurrences as long as there is some suitable habitat present and the project area lies within the known range. However, this definition indicates a plant or animal still has a low potential even if both habitat and records are lacking which is actually the definition used to indicate "not expected".

Arguably, if no suitable habitat is present then either a species would not be expected to occur at all or the species would not be expected to occur for any substantial period of time (i.e., only during dispersal or migration). This recognition is also lacking from these definitions, although a reference to the consideration is given in the text after the definitions.

In the document, the text often seems to contradict itself to some extent by attributing a "low" or "moderate" potential to occur but then explaining that suitable habitat is lacking or that the project area lies outside the species known range or at least its known breeding range."

Please consider revising the definitions to be consistent with those used in the PEA (included below for reference). At a minimum, please clarify these definitions to avoid the confusion described above.

The definitions presented below are suggested as an alternative to the PEA definitions.

- Present: Species was observed within the Project Study Area during biological surveys
- High: CNDDB or other documented occurrences have been recorded within 1.0 mile of the project area and suitable habitat is present.
- Moderate: CNDDB or other documented occurrences have been recorded within 5 miles of the project area and suitable habitat is present (suitable nesting or roosting habitat or high quality foraging areas). Individuals were not observed during field surveys; however, the species could be present.
- Low: Suitable or at least marginally suitable habitat may occur in the project area but no CNDDB records reported in recent years; records of the species within 5 miles of the project area are suspected to be now extirpated or potentially misidentified with other species; or individuals were not observed during field surveys and are not anticipated to be present. For bird and bat species, this category may be used for species that are documented, but likely to be only transient through the area during foraging or migratory movements, no suitable nesting or roosting habitat is present.

F3-586  
cont.

### Responses to Comment Set F3 – Appendix 7 Biological Resources

F3-586 The commenter recommends that the criteria used to determine the potential for each species to occur along the project be included in the sections for vegetation and wildlife.

The criteria used to determine potential for occurrence for special-status species are described in Appendix 7 along with the tables that list the potential for occurrence of each species. The Final EIS biological resources sections that discuss vegetation (Section D.4.1.1 Regional Setting and Approach to Data Collection) and wildlife (Section D.5.1.1 Regional Setting and Approach to Data Collection) provide a summary of the potential for occurrence ranks and a reference to Appendix 7 for the criteria used to determine the ranks.

The commenter states that the criteria used to determine potential for occurrence for special-status species are not consistent with the PEA and result in misleading conclusions.

The EIS represents the BLM's independent analysis of the project's environmental setting and expected impacts. The EIS makes extensive use of data provided in the PEA, but does not rely exclusively on the PEA's evaluations of species occurrence likelihood. The occurrence probabilities in the EIS were determined based on careful analysis of all available information, to ensure that all project impacts to special-status species are analyzed and disclosed. The criteria used in the EIS are more conservative than those used in the PEA; nevertheless, they are straightforward and accurate.

The commenter states that there are no records of California gnatcatcher in Segment 4 and the limited habitat present occurs at elevations above where this species normally is found. Contrary to the comment, there is a California gnatcatcher record in the vicinity of Segment 4. The elevational range of California gnatcatcher in Riverside and San Bernardino Counties extends to at least 2600 feet and there are multiple records in the region between 2000 and 2600 feet elevation. Much of Segment 4 is within this elevational range. In addition, habitat in the area is modeled as suitable in a published scientific report, as described in the EIS. In the absence of project-related surveys for California gnatcatcher along Segment 4, the analysis properly relied on these additional information sources.

The commenter states that the phrase "within the proposed route" is unclear and the criteria used to determine potentials for occurrence are confusing and misleading. The commenter states that the text of Appendix 7 contradicts itself in regard to the stated potential for occurrence for species and their criteria rank.

The text of criteria used to determine potential for occurrence for special-status species in Appendix 7 have been revised to state "within the vicinity of the proposed route" rather than "within the proposed route." A species' potential for occurrence is based on a biological analysis of many factors and takes into consideration that knowledge of specific habitat parameters are often incomplete. As general guidelines, the criteria are straightforward and accurate, albeit conservative, evaluations of each species' potential for occurrence.

The commenter requests revising the criteria to be consistent with those in the PEA and provides suggested criteria as an alternative to the PEA. SCE's suggested alternative criteria are somewhat less conservative than the criteria used in the Draft EIR/EIS. The criteria presented in the Draft EIR/EIS is more conservative and is straightforward and is suitable for CEQA and NEPA analysis. Therefore, the requested revisions were not made.

Comment Set F3: Southern California Edison Company (cont.)

Appendix 9 Policy Screening Report

City of Loma Linda, CA Ap.9-44

DEIR/DEIS Text:

City of Loma Linda

F3-587

Applicable Policies	Determination	Consistent ?
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LAND USE

Special Planning Area E Implementing Policy j: Implement development of the Mission Road Special Planning Area E through the adoption of a specific plan(s) or planned development(s), so that specific siting of land uses/buildings, architectural design, landscaping, road infrastructure, utilities, and other elements can be planned in a comprehensive, rather than piecemeal, manner throughout the Special Planning Area. Implementing Policy 8.10.7.1: a) Work with Southern California Edison to improve transmission line corridors with attractive, community-serving uses such as ornamental planting and recreational uses, including trails and playing fields. ... d.

Underground existing overhead utility lines throughout the City with available funding...g. Develop appropriate siting regulations for the installation of utilities and telecommunication facilities to minimize potential impacts to the community.

The Proposed Project improvements in the City of Loma Linda include improvements to Timoteo Substation, and the proposed 220 kV transmission lines, 66 kV subtransmission lines, and telecommunications facilities. The Proposed Project work in Timoteo Substation would involve only modifications to the 66 kV equipment, and work would occur on the 66 kV switchrack and within the MEER. The 220 kV transmission lines work includes replacement of existing transmission infrastructure within an existing transmission line ROW that has been established for several decades. New 66 kV subtransmission line improvements would be constructed primarily in existing public streets.

YES



## Comment Set F3: Southern California Edison Company (cont.)

### SCE Comment:

As a result of additional engineering analysis, the work Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

F3-587  
cont.

City of Loma Linda		
Applicable Policies	Determination	Consistent?
<u>LAND USE</u>		
<p>Special Planning Area E Implementing Policy j: Implement development of the Mission Road Special Planning Area E through the adoption of a specific plan(s) or planned development(s), so that specific siting of land uses/buildings, architectural design, landscaping, road infrastructure, utilities, and other elements can be planned in a comprehensive, rather than piecemeal, manner throughout the Special Planning Area. Implementing Policy 8.10.7.1: a) Work with Southern California Edison to improve transmission line corridors with attractive, community-serving uses such as ornamental planting and recreational uses, including trails and playing fields. . . . d. Underground existing overhead utility lines throughout the City with available funding...g. Develop appropriate siting regulations for the installation of utilities and telecommunication facilities to minimize potential impacts to the community.</p>	<p>The Proposed Project improvements in the City of Loma Linda include <del>improvements to Timoteo Substation</del>, and the proposed 220 kV transmission lines, 66 kV subtransmission lines, and telecommunications facilities--<del>The Proposed Project work in Timoteo Substation would involve only modifications to the 66 kV equipment, and work would occur on the 66 kV switchrack and within the MEER.</del> The 220 kV transmission lines work includes replacement of existing transmission infrastructure within an existing transmission line ROW that has been established for several decades. New 66 kV subtransmission line improvements would be constructed primarily in existing public streets.</p>	<p>YES</p>

**Responses to Comment Set F3 – Appendix 9 Policy Screening Report**

- F3-587      The comment notes that Timoteo and Tennessee Substations are no longer needed in support of the Proposed Project. Appendix 9 Policy Screening Report, page Ap.9-44, second column, has been revised to delete reference to the Timoteo and Tennessee Substations.

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**Table B-1. Typical Transmission Structure Dimensions**

Type of Structure (New Proposed)	Proposed Number of Structures	Approximate Height Above Ground	Approximate Pole Diameter	Approximate Auger Hole Depth	Approximate Auger Diameter
LST	<del>204</del> 384	110- <del>189</del> 193 feet	N/A	15-50 feet	3.0-7.0 feet at each leg
TSP	<del>76</del> 83	110- <del>200</del> 198 feet	3.0- <del>7.0</del> 10.0 ft	30-60 feet	5- <del>12</del> 14 feet

Source: SCE, ~~2013~~ 2015

Note: Specific structure type, foundation type, quantities, height, and spacing would be determined upon final engineering, and would be constructed in compliance with CPUC General Order 95.

Footnote 1- Includes ~~34~~ 34 TSPs in Segment 5 per agreement between SCE and Morongo.

**Table B-2. Transmission 220 kV Removal and Installation Per Segment**

	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
<b>Proposed Project Removals</b>							
Double-circuit lattice steel tower	44	<del>26</del> 23	33	<del>27</del> 36	33	<del>28</del> 33	<del>200</del> 202
Single-circuit lattice STEEL tower	1	0	85	61	34	30	211
H-frame	0	0	0	53	55	45	153
Three-pole structure	0	0	0	10	10	9	29
Single-circuit TSP	0	0	0	0	5	0	5
Conductor (miles)	59	31	120	148	108	96	562
OHGW (miles)	7	5	50	63	45	40	210
<b>Proposed Project Installation</b>							
Double-circuit lattice steel tower	<del>46</del> 42	<del>10</del> 18	<del>94</del> 86	<del>98</del> 97	<del>60</del> 62	<del>77</del> 79	<del>204</del> 384
Double-circuit tubular steel pole	<del>1</del> 2	<del>7</del> 5	<del>10</del> 16	14	<del>28</del> 36	<del>2</del> 6	<del>73</del> 79
Single-circuit tubular steel pole	2	2	0	0	0	0	4
Circuit length (miles)	14	10	40	48	36	32	180
Conductor (miles)	87	67	264	320	250	211	1199
OPGW (miles)	7	6	22	26	20	18	99
OHGW (miles)	0.5	0.5	0.5	0.5	0	3	5
<b>Proposed Project Existing Tower to be Modified</b>							
Double Circuit lattice steel tower	1	46	4	66	0	60	<del>10</del> 17

Comment Set F4 – Southern California Edison (cont.)

## Southern California Edison's West of Devers Upgrade Project Additional Material Yard Environmental Review

F4-2

PREPARED FOR: MPO  
PREPARED BY: Patty Nevins/SCE CEHS  
DATE: September 22, 2015

SCE has included an additional Material Staging Yard, due to the potential for any one of the yards listed in the West of Devers Upgrade DEIR Section B Project Description Table B-5 to be occupied and unavailable prior to SCE commencing with construction. SCE has also updated Figure B-16 to include the additional yard. The environmental analysis of this additional yard, as well as SCE's conclusion that the addition of this yard would not result in any additional impacts beyond those already described in the DEIR/DEIS, is described below:

Table B-5. Potential Staging Yard Locations

Yard Name	Location	Condition	Approx Area (acres)
Match Material and Equipment Staging Area	SE corner of E Theodore St and N Hathaway	Previously Disturbed; vacant	21

**Match Corporation Material Yard:** The site is located in the city of Banning, Riverside County, California, Parcel Numbers 534-241-003, 534-241-004, 534-242-001, 534-241-002, and 534-242-003. The site is bounded on the south, southwest, and west by residential and undeveloped properties, on the east by North Hathaway Street/Morongo Reservation, and on the north by a sand and gravel mining operation. The site encompasses an area of approximately 21 acres and has historically been used as an equipment and materials yard. The site surface is composed of approximately 50 percent concrete (paved) and 50 percent friable soil.

### Aesthetics

- Using the site as a material yard is a similar use to previous uses. Residences are located bounding the south, southwest, and west sides of the proposed material yard. The proposed fence and screening will mitigate visual impacts. The material yard will be fenced for security and the fence would contain a visual barrier to minimize views into the site. The material yard would not conflict with the types of structures and uses in the area and would not result in a change to the visual character of the area.
- The material yard would be temporary in nature and generally consistent with the conclusion in Section D.18 Visual Resources p. D.18-33 of the DEIR.

### Agriculture and Forestry Resources

#### Comment Set F4 – Southern California Edison (cont.)

- The site is not currently used for agricultural and forestry purposes. The site use is temporary and would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use or result in the conversion or loss of forest land to non-forest use.
- The material yard would be temporary in nature and generally consistent with the conclusion in Section D.2 Agricultural p. D.2-10 of the DEIR.

F4-2  
cont.

##### Air Quality

- Historic uses of the site are similar to what SCE is proposing. There are sensitive receptors across the street from the yard, but the proposed yard would not introduce new sources of pollutants since the proposed use is consistent with the existing use.
- In addition, with the incorporating of the DEIR proposed mitigation measures, the material yard would be temporary in nature and generally consistent with the conclusion in Section D.3 Air Quality p. D.3-15 of the DEIR.

##### Biological Resources

- Based on a field visit to the site and review of available reports and materials, construction and operation of the yard would not result in significant or substantial adverse effects on any known candidate, sensitive, or special status species. The Los Angeles pocket mouse (*Perognathus longimembris brevinosus*), and San Diego pocket mouse (*Chaetodipus follox follox Northwestern*) have a potential to occur in the area. With incorporation of the DEIR Mitigation Measures, which would apply to the construction and operation of the material yards, potential impacts would be reduced, and be generally consistent with the conclusion in Section D.4 and D.5.

##### Cultural Resources

- The proposed material yard has been surveyed for cultural resources (DeCarlo 2015, submitted to CPUC under separate cover). No cultural resources were recorded within the proposed material yard. Mitigation Measures identified in the DEIR and the cultural report include measures to reduce potentially significant impacts from the Project, which would apply to the construction and operation of the material yards.
- Based on the cultural resources survey and review of available materials, potential impacts to cultural resources would be less than significant and are generally consistent with the conclusion in Sections D.7 and D.14.

##### Geology and Soils

- No geological hazards were observed at the site. Due to the temporary nature of construction activities, the probability of a large earthquake exposing construction personnel to fault rupture and seismic-related hazards during construction of the Proposed Project would be extremely low. Implementation of SWPPPs and soil stabilization measures would reduce the potential for soil erosion. The site will be restored to the current configuration upon completion of

## Comment Set F4 – Southern California Edison (cont.)

construction. Topsoil materials may have to be removed and set aside during grading operations. Erosion controls will mitigate erosion of topsoil materials. Therefore, the Proposed Project would have a less than significant impact to geology and soils with regard to construction and operation of the material yard, and would be generally consistent with the conclusion in Section D.9.

F4-2  
cont.

### Climate Change

- The greenhouse gas emission calculations in the DEIR assumed that material yards would be needed and were incorporated into the project design. Therefore, construction of the new material yard will not result in a net increase in construction activities with the potential to impact greenhouse gas emissions not already addressed by the DEIR. In addition, the material yard would be temporary in nature and generally consistent with the conclusion in Section D.6 Climate Change.

### Hazards and Hazardous Materials

- The proposed material yard will not result in construction activities with the potential to impact the location and quantity of hazards and hazardous materials not already addressed by the DEIR. In addition, the siting of a material yard does not contain listed DTSC sites. Therefore, impacts are generally consistent with the conclusion in Section D.10.

### Hydrology and Water Quality

- Based on field evaluation, the site does not contain drainage(s) that would be considered jurisdictional waters. Therefore, the proposed material yard does not significantly affect area hydrology and water quality.

### Land Use and Planning

- The siting of a material yard at this site would not physically divide an established community or conflict with any applicable land use plan or zoning ordinance, habitat conservation, or natural community conservation plan. As noted in the DEIR, the Proposed Project construction would not conflict with locally adopted land use plans, policies, or regulations, and impacts would be less than significant. The Matich Yard location would fall under the City of Banning General Plan and would be consistent with the plan, policies and programs. Land that may be disturbed at a staging yard would be restored to pre-construction conditions or to conditions agreed upon between SCE and the landowner. Therefore, impacts are generally consistent with the conclusions in Section D.11.

### Mineral Resources

- Although mineral resources in the form of sand and gravel are found in the general area, the site does not appear to have been used as a source of sand and gravel. A large sand and gravel mining operation is located adjacent to the site along the northern boundary. The material yard



#### Comment Set F4 – Southern California Edison (cont.)

is considered temporary and would have no impact on mineral resources in the future. Therefore, impacts are generally consistent with the conclusions in Section D.12.

F4-2  
cont.

##### Noise

- The potential noise generated by material yard operations is anticipated to be similar to the noise generated by historic use of the site as well as the sand and gravel mining operation, located to the north. Therefore, the proposed material yard will not result in a net increase in noise impacts not already addressed by the DEIR Environmental Impact Analysis. Therefore, impacts are generally consistent with the conclusions in Section D.13.

##### Socioeconomics, Population and Housing, and Environmental Justice

- The site would not induce growth or result in the displacement of housing that would require construction of replacement housing elsewhere. Based on the use of the site and the socioeconomics, population and housing, and environmental justice impact analysis presented in the DEIR, the siting of a material yard at this location does not result in significant additional impacts beyond those already discussed in Section D.8

##### Public Services and Utilities and Service Systems

- The site will not require significant additional public services to operate. The DEIR analysis anticipated the use of material yards to support construction. Therefore, the siting of a material yard at this location does not result in significant additional impacts from what was analyzed in Section D.17.
- The site will not require significant additional utility services to operate with the exception of an electrical distribution line. Electrical lines are readily available in the general area and the material yard will only require minimal energy to operate. Portable toilets will be used for personnel operating the material yard. Therefore, the siting of a material yard at this location does not result in significant additional utility and service system impacts.

##### Recreation

- The site is not located adjacent to or nearby existing recreation areas. The proposed project will not utilize existing recreational facilities. Therefore, the siting of a material yard at this location does not result in significant additional impacts and is generally consistent with the conclusions in Section D.15

##### Transportation and Traffic

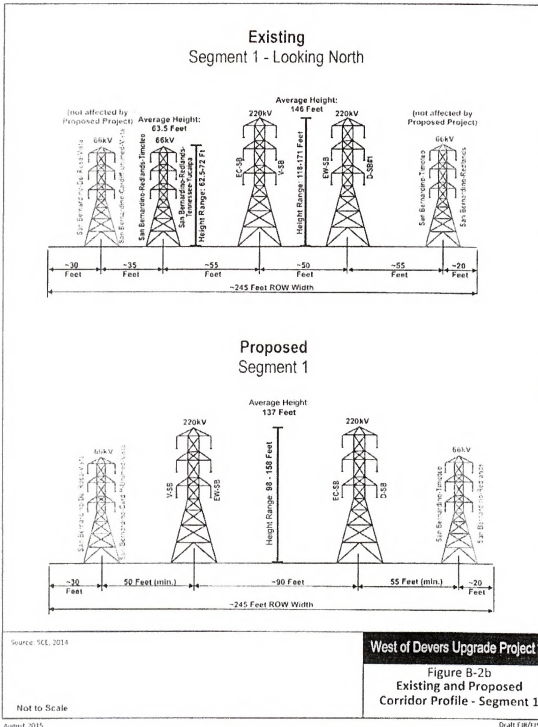
- The site has been used as a materials and equipment yard. In addition, Hathaway Street, is a main road with existing truck traffic from adjacent uses. Because of the temporary nature of the yard and with the incorporation of mitigation measures proposed in Section D.16 Transportation and Traffic, impacts would be generally consistent with the conclusions in the DEIR.



Comment Set F4 – Southern California Edison (cont.)

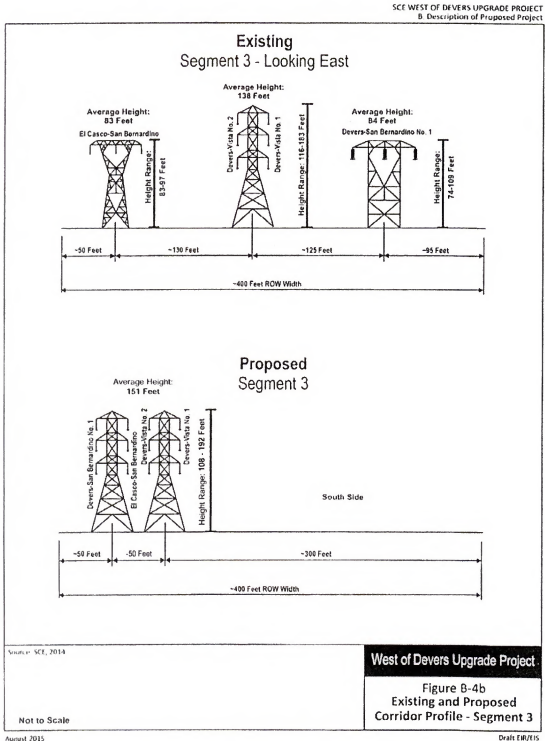
SCE WEST OF DEVERS UPGRADE PROJECT  
B. Description of Proposed Project

F4-4





Comment Set F4 – Southern California Edison (cont.)

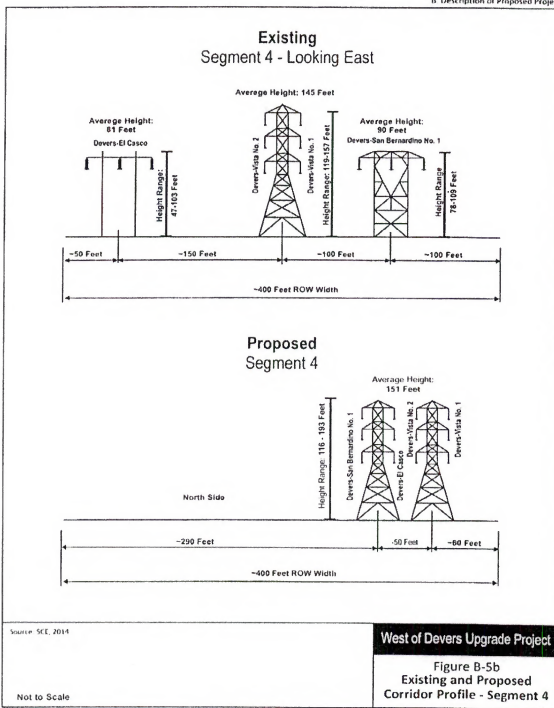


F4-4  
cont.

Comment Set F4 – Southern California Edison (cont.)

SCE WEST OF DEVERS UPGRADE PROJECT  
B. Description of Proposed Project

F4-4  
cont.



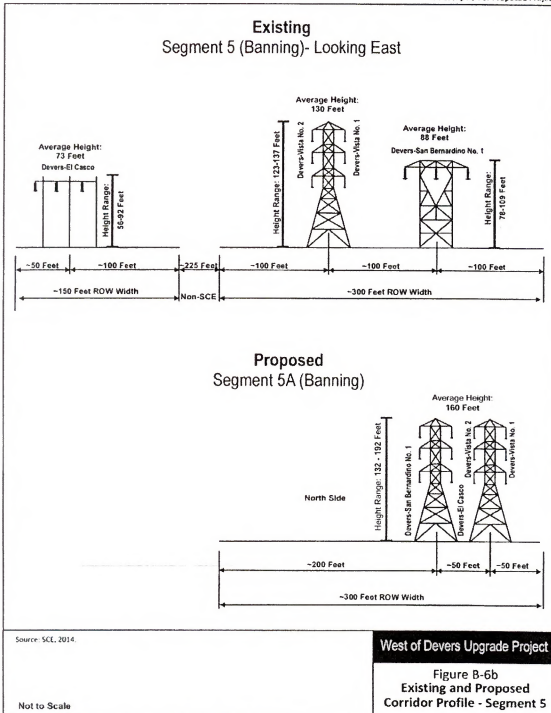
August 2015

Drawn EIR/ES

Comment Set F4 – Southern California Edison (cont.)

SCE WEST OF DEVERS UPGRADE PROJECT  
B. Description of Proposed Project

F4-4  
cont.



August 2015

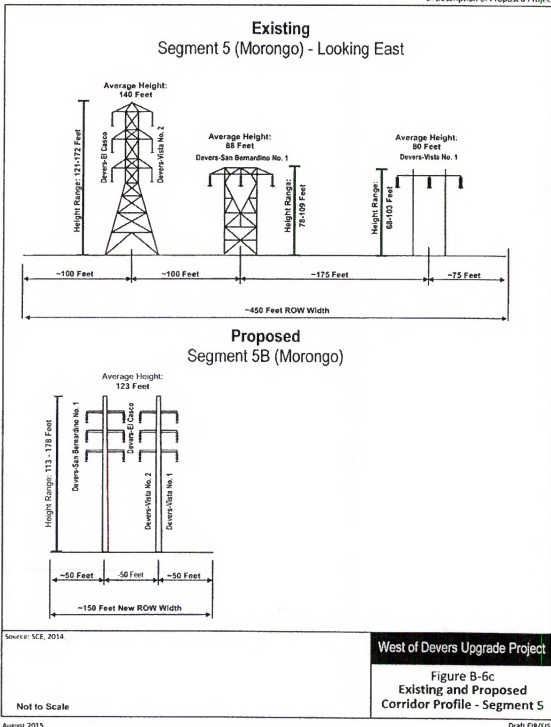
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Comment Set F4 – Southern California Edison (cont.)

SCE WEST OF DEVERS UPGRADE PROJECT  
B. Description of Proposed Project

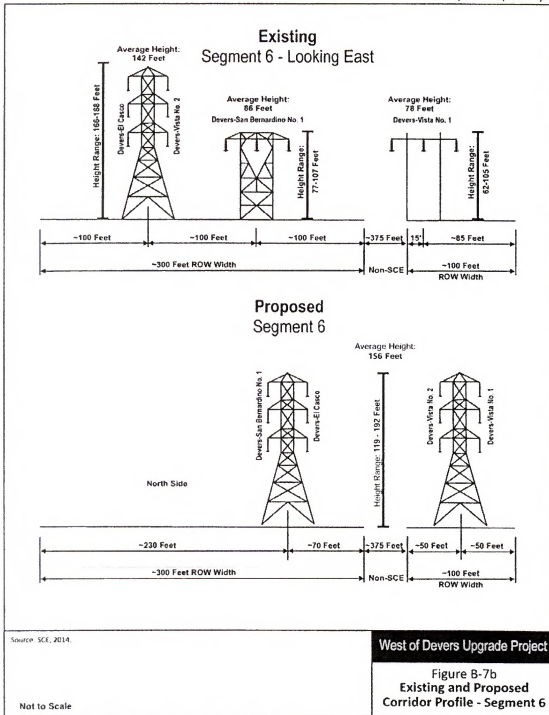
F4-4  
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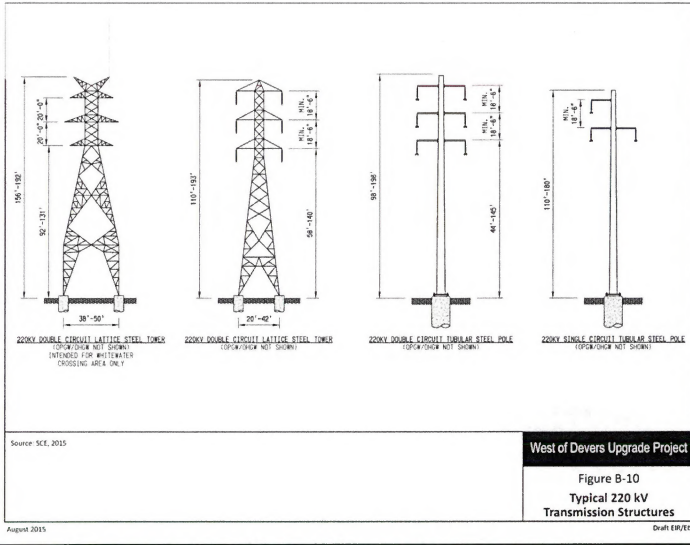
Comment Set F4 – Southern California Edison (cont.)

SCE WEST OF DEVERS UPGRADE PROJECT  
B Description of Proposed Project

F4-4  
cont.



Comment Set F4 – Southern California Edison (cont.)



Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
1E03	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	141
1E04	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	156
1E05	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	140
1E06	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	132
1E08	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	135
1E10	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	158
1E11	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	146
1E12	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	131
1E13	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	126
1E15	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	128
1E16	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	119
1E17	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	129
1E18	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	147
1E19	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	144
1E20	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	157
1E21	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	149
1E22	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	132
1E23	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	126
1E24	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	126
1E25	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	138
1E26	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	156
1E27	El Casco-San Bernardino	n/a	Proposed	TSP	133
1E28	Devers-San Bernardino	n/a	Proposed	TSP	133
1W00	Etiwanda-San Bernardino	San Bernardino-Vista	Modify	LST	141
1W01	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	TSP	98
1W02	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	TSP	98
1W03	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	144
1W04	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	154
1W05	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	141
1W06	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	132
1W08	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	135
1W10	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	158
1W11	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	146
1W12	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	132
1W13	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	125
1W15	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	128
1W16	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	120
1W17	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	129
1W18	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	147
1W19	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	144
1W20	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	157
1W21	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	151
1W22	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	133
1W23	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	126
1W24	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	126
1W25	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	139
1W26	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	156
SB15	Devers-San Bernardino	n/a	Modify	Rack	65
SB25	El Casco-San Bernardino	n/a	Modify	Rack	65
SB6N	Etiwanda-San Bernardino	n/a	Modify	Rack	65
SB75	San Bernardino-Vista	n/a	Modify	Rack	65
MO-T1	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	170
MO-T1(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	171
MO-T2	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	131

F4-6

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M0-T2(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M0-T3	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	127
M0-T3(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	127
M0-T4	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	126
M0-T4(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M0-T5	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	138
M0-T5(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	139
M0-T6	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	138
M0-T6	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	138
M0-T7	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	146
M0-T7	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	146
M0-T8	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M0-T8	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	131
M1-T1	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	138
M1-T1(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	138
M1-T2	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	123
M1-T2(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	124
M1-T3	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	123
M1-T3(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	123
M1-T4	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	121
M1-T4(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	116
M1-T5	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M1-T5	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	133
M1-T6	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M1-T6	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	131
M1-T7	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M1-T7	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	130
M2-T1	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	153
M2-T1(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	155
M2-T2	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	146
M2-T2(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	147
M2-T3	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	148
M2-T3(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	148
M2-T4	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	154
M2-T4(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	155
M2-T5	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	118
M2-T5	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	117
M39-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	165
M3-T1	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	122
M3-T1(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	148
M3-T2	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	128
M3-T2(3)	San Bernardino-Vista	n/a	Remove	LST	128

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
2N01	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	164
2N02	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	172
2N04	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	189
2N06	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	143
2N07	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	167
2N08	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	124
2N10	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	161
2N11	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
2N12	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
2N14	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
2N15	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	158
2N16	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
2N17	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	153
2N18	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	184
2N20	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
2N21	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
2N22	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	134
2N23	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
2N25	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
2N26	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	174
2N28	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	156
2N29	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	150
2N30	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	131
2N31	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	147
2N32	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
2N33	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	158
2N34	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
2N35	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
2N36	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	143
2N37	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	168
2N38	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	168
V1C	Devers-Vista No.1	Devers-Vista No.2	Modify	Rack	65
V1XC	Devers-Vista No.2	Devers-Vista No.2	Modify	Rack	65
M39-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	174
M40-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	144
M40-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	111
M40-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	131
M40-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M41-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	122
M41-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M41-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	150
M41-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	140
M42-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	145
M42-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	122
M42-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	141
M42-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	144
M42-T5	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	153
M43-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	112
M43-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	123
M43-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	123
M43-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	166
M43-T6	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	158
M44-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	149
M44-T5	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	137

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M44-T6	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	141
M44-T7	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	141
M44-T8	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	141
MS-T1(2)	El Casco-San Bernardino	n/a	Remove	LST	141

F4-6  
cont.



Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
3N01	Devers-San Bernardino	El Casco-San Bernardino	Modify	LST	133
3N02	Devers-San Bernardino	El Casco-San Bernardino	Modify	LST	129
3N03	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	129
3N04	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	127
3N06	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	116
3N07	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	182
3N08	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	145
3N10	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	181
3N12	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	135
3N13	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	181
3N14	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	159
3N15	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	166
3N16	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	123
3N17	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	153
3N19	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	127
3N20	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	128
3N21	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	143
3N22	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	182
3N23	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	144
3N24	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	164
3N25	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	131
3N26	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	153
3N27	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	147
3N28	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	134
3N29	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	192
3N31	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	127
3N32	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	134
3N33	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	169
3N35	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	108
3N36	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	183
3N37	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	136
3N38	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	125
3N39	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	159
3N40	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	131
3N41	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	191
3N42	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	124
3N43	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	136
3N44	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	163
3N46	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	128
3N48	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	128
3N50	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	182
3N51	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	164
3N53	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	153
3N55	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	152
3N56	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	139
3N57	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	166
3N59	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	154
3N60	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	161
3N61	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	152
3N62	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	156
3N63	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	124
3N64	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	163
3N65	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	140
3501	Devers-Vista No. 1	Devers-Vista No. 2	Modify	LST	175

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
3502	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	128
3503	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	163
3504	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	181
3506	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	143
3507	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
3508	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
3510	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	191
3512	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	135
3513	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
3514	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	159
3515	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	189
3516	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	138
3517	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	163
3519	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	127
3520	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	128
3521	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	143
3522	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	191
3523	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	135
3524	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
3525	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	129
3526	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	153
3527	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	131
3528	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	151
3529	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
3531	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	134
3532	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	129
3533	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	177
3535	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	108
3536	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	183
3537	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	132
3538	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	127
3539	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
3540	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	132
3541	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
3542	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	125
3543	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	136
3544	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
3546	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	128
3548	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	129
3550	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
3551	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	159
3553	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	153
3555	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	159
3556	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	140
3557	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	162
3559	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154
3560	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	162
3561	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	152
3562	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
3563	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	124
3564	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
3565	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	180
EC1N	El Casco-San Bernardino	n/a	Modify	Rack	65
M29-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	115

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M30-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	177
M30-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	152
M30-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M30-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	151
M31-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	129
M31-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	155
M31-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	151
M32-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	146
M32-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	150
M32-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M33-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M33-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	137
M33-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	132
M33-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	122
M33-T5	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	118
M34-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	118
M34-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	117
M34-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	147
M35-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M35-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	121
M36-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	127
M36-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	134
M36-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M37-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	135
M37-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	134
M37-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	178
M38-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	182
M38-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	155
M38-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	142
M38-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	133
M39-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	129
M39-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	146
M89-T1	Devers-San Bernardino No.1	n/a	Remove	LST	90
M89-T2	Devers-San Bernardino No.1	n/a	Remove	LST	83
M89-T3	Devers-San Bernardino No.1	n/a	Remove	LST	74
M90-T1	Devers-San Bernardino No.1	n/a	Remove	LST	77
M90-T2	Devers-San Bernardino No.1	n/a	Remove	LST	74
M90-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M90-T4	Devers-San Bernardino No.1	n/a	Remove	LST	81
M91-T1	Devers-San Bernardino No.1	n/a	Remove	LST	82
M91-T2	Devers-San Bernardino No.1	n/a	Remove	LST	81
M91-T3	Devers-San Bernardino No.1	n/a	Remove	LST	82
M92-T1	Devers-San Bernardino No.1	n/a	Remove	LST	83
M92-T2	Devers-San Bernardino No.1	n/a	Remove	LST	108
M92-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M93-T1	Devers-San Bernardino No.1	n/a	Remove	LST	78
M93-T2	Devers-San Bernardino No.1	n/a	Remove	LST	83
M93-T3	Devers-San Bernardino No.1	n/a	Remove	LST	98
M93-T4	Devers-San Bernardino No.1	n/a	Remove	LST	75
M94-T1	Devers-San Bernardino No.1	n/a	Remove	LST	78
M94-T2	Devers-San Bernardino No.1	n/a	Remove	LST	78
M95-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M95-T2	Devers-San Bernardino No.1	n/a	Remove	LST	78
M95-T3	Devers-San Bernardino No.1	n/a	Remove	LST	80

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M96-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M96-T2	Devers-San Bernardino No.1	n/a	Remove	LST	76
M96-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M97-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M97-T2	Devers-San Bernardino No.1	n/a	Remove	LST	83
M97-T3	Devers-San Bernardino No.1	n/a	Remove	LST	90
M98-T1	Devers-San Bernardino No.1	n/a	Remove	LST	108
M98-T2	Devers-San Bernardino No.1	n/a	Remove	LST	108
M98-T3	Devers-San Bernardino No.1	n/a	Remove	LST	80
M99-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M99-T2	Devers-San Bernardino No.1	n/a	Remove	LST	79
M99-T3	Devers-San Bernardino No.1	n/a	Remove	LST	81
PP#123223	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123224	El Casco-San Bernardino	n/a	Remove	LST	84
PP#123225	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123226	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123227	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123228	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123229	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123230	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123231	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123232	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123233	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123234	El Casco-San Bernardino	n/a	Remove	LST	84
PP#123235	El Casco-San Bernardino	n/a	Remove	LST	96
PP#123236	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123237	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123238	El Casco-San Bernardino	n/a	Remove	LST	94
PP#123239	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123240	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123241	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123242	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123243	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123244	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123245	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123246	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123247	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123248	El Casco-San Bernardino	n/a	Remove	LST	83
PP#123249	El Casco-San Bernardino	n/a	Remove	LST	82
PP#123250	El Casco-San Bernardino	n/a	Remove	LST	83
PP#123251	El Casco-San Bernardino	n/a	Remove	LST	94
PP#123252	El Casco-San Bernardino	n/a	Remove	LST	84
PP#123253	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123254	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123255	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123256	El Casco-San Bernardino	n/a	Remove	LST	84
PP#123257	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123258	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123259	El Casco-San Bernardino	n/a	Remove	LST	96
PP#123260	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123261	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123262	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123263	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123264	El Casco-San Bernardino	n/a	Remove	LST	86

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
PP#123265	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123266	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123267	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123268	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123269	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123270	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123271	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123272	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123273	El Casco-San Bernardino	n/a	Remove	LST	97

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
4N01	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	153
4N02	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	163
4N03	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	180
4N04	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	193
4N05	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	128
4N06	Devers-San Bernardino	Devers-El Casco	Proposed	LST	134
4N07	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
4N08	Devers-San Bernardino	Devers-El Casco	Proposed	LST	127
4N09	Devers-San Bernardino	Devers-El Casco	Proposed	LST	167
4N10	Devers-San Bernardino	Devers-El Casco	Proposed	LST	117
4N12	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	153
4N13	Devers-San Bernardino	Devers-El Casco	Modify	LST	125
4N14	Devers-San Bernardino	Devers-El Casco	Proposed	LST	163
4N15	Devers-San Bernardino	Devers-El Casco	Proposed	LST	129
4N16	Devers-San Bernardino	Devers-El Casco	Proposed	LST	130
4N17	Devers-San Bernardino	Devers-El Casco	Proposed	LST	140
4N18	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
4N19	Devers-San Bernardino	Devers-El Casco	Proposed	LST	133
4N20	Devers-San Bernardino	Devers-El Casco	Proposed	LST	133
4N21	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
4N22	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
4N23	Devers-San Bernardino	Devers-El Casco	Proposed	LST	137
4N24	Devers-San Bernardino	Devers-El Casco	Proposed	LST	161
4N25	Devers-San Bernardino	Devers-El Casco	Proposed	LST	164
4N26	Devers-San Bernardino	Devers-El Casco	Proposed	LST	191
4N27	Devers-San Bernardino	Devers-El Casco	Proposed	LST	191
4N29	Devers-San Bernardino	Devers-El Casco	Proposed	LST	148
4N30	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
4N31	Devers-San Bernardino	Devers-El Casco	Proposed	LST	145
4N32	Devers-San Bernardino	Devers-El Casco	Proposed	LST	165
4N34	Devers-San Bernardino	Devers-El Casco	Modify	LST	154
4N35	Devers-San Bernardino	Devers-El Casco	Proposed	LST	153
4N36	Devers-San Bernardino	Devers-El Casco	Proposed	LST	138
4N37	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
4N38	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
4N39	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
4N40	Devers-San Bernardino	Devers-El Casco	Proposed	LST	127
4N41	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
4N42	Devers-San Bernardino	Devers-El Casco	Proposed	LST	146
4N43	Devers-San Bernardino	Devers-El Casco	Proposed	LST	166
4N44	Devers-San Bernardino	Devers-El Casco	Proposed	LST	159
4N45	Devers-San Bernardino	Devers-El Casco	Proposed	LST	156
4N46	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
4N47	Devers-San Bernardino	Devers-El Casco	Proposed	LST	158
4N48	Devers-San Bernardino	Devers-El Casco	Proposed	LST	189
4N50	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
4N51	Devers-San Bernardino	Devers-El Casco	Proposed	LST	156
4N52	Devers-San Bernardino	Devers-El Casco	Proposed	LST	129
4N53	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
4N54	Devers-San Bernardino	Devers-El Casco	Proposed	LST	148
4N55	Devers-San Bernardino	Devers-El Casco	Proposed	LST	155
4N56	Devers-San Bernardino	Devers-El Casco	Modify	LST	176
4N57	Devers-San Bernardino	Devers-El Casco	Proposed	LST	120
4N58	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	138

F4-6  
cont.



Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
4N59	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	128
4N60	Devers-San Bernardino	Devers-El Casco	Proposed	LST	149
4N61	Devers-San Bernardino	Devers-El Casco	Proposed	LST	136
4N62	Devers-San Bernardino	Devers-El Casco	Proposed	LST	119
4N63	Devers-San Bernardino	Devers-El Casco	Proposed	LST	135
4N64	Devers-San Bernardino	Devers-El Casco	Proposed	LST	134
4N65	Devers-El Casco	n/a	Modify	LST	132
4501	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	153
4502	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	188
4503	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	188
4504	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	193
4505	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	128
4506	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
4507	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
4508	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	128
4509	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	167
4510	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	119
4512	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	148
4513	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	117
4514	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
4515	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	130
4516	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	133
4517	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
4518	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
4519	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	133
4520	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	133
4521	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
4522	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
4523	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	136
4524	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	160
4525	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
4526	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	191
4527	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
4529	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	148
4530	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
4531	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	145
4532	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
4534	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	159
4535	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
4536	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
4537	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	187
4538	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
4539	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
4540	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	127
4541	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
4542	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	150
4543	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	166
4544	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	158
4545	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	156
4546	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
4547	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
4548	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
4550	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
4551	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163

F4-6  
cont.



Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
4552	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	138
4553	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
4554	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	145
4555	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
4556	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
4557	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	124
4558	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	139
4559	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	148
4560	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
EC7N	Devers-El Casco	n/a	Modify	Rack	65
M17-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M18-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	123
M18-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	157
M18-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	127
M18-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	124
M19-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	136
M19-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	133
M19-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	148
M20-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M20-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	149
M20-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	125
M21-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	127
M21-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	124
M21-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	131
M21-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	127
M22-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	120
M22-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M22-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	136
M22-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	133
M23-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	131
M23-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	155
M23-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	155
M24-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	143
M24-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M24-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	144
M24-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	140
M25-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	145
M25-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	124
M25-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	145
M25-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	140
M26-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	137
M26-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	157
M26-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	151
M27-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	135
M27-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	156
M27-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	144
M27-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	126
M27-T3	Devers-San Bernardino No.1	n/a	Remove	LST	104
M78-T1	Devers-San Bernardino No.1	n/a	Remove	LST	90
M78-T2	Devers-San Bernardino No.1	n/a	Remove	LST	77
M78-T3	Devers-San Bernardino No.1	n/a	Remove	LST	82
M78-T4	Devers-San Bernardino No.1	n/a	Remove	LST	85
M79-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M79-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M79-T3	Devers-San Bernardino No.1	n/a	Remove	LST	90
M80-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M80-T2	Devers-San Bernardino No.1	n/a	Remove	LST	90
M80-T3	Devers-San Bernardino No.1	n/a	Remove	LST	102
M80-T4	Devers-San Bernardino No.1	n/a	Remove	LST	90
M81-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M81-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M81-T3	Devers-San Bernardino No.1	n/a	Remove	LST	85
M81-T4	Devers-San Bernardino No.1	n/a	Remove	LST	84
M82-T1	Devers-San Bernardino No.1	n/a	Remove	LST	82
M82-T2	Devers-San Bernardino No.1	n/a	Remove	LST	83
M82-T3	Devers-San Bernardino No.1	n/a	Remove	LST	95
M82-T4	Devers-San Bernardino No.1	n/a	Remove	LST	84
M83-T1	Devers-San Bernardino No.1	n/a	Remove	LST	89
M83-T2	Devers-San Bernardino No.1	n/a	Remove	LST	108
M83-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M84-T1	Devers-San Bernardino No.1	n/a	Remove	LST	102
M84-T2	Devers-San Bernardino No.1	n/a	Remove	LST	79
M84-T3	Devers-San Bernardino No.1	n/a	Remove	LST	102
M84-T4	Devers-San Bernardino No.1	n/a	Remove	LST	103
M85-T1	Devers-San Bernardino No.1	n/a	Remove	LST	102
M85-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M85-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M85-T4	Devers-San Bernardino No.1	n/a	Remove	LST	101
M86-T1	Devers-San Bernardino No.1	n/a	Remove	LST	88
M86-T2	Devers-San Bernardino No.1	n/a	Remove	LST	91
M86-T3	Devers-San Bernardino No.1	n/a	Remove	LST	103
M87-T1	Devers-San Bernardino No.1	n/a	Remove	LST	82
M87-T2	Devers-San Bernardino No.1	n/a	Remove	LST	88
M87-T3	Devers-San Bernardino No.1	n/a	Remove	LST	77
M87-T4	Devers-San Bernardino No.1	n/a	Remove	LST	78
M88-T1	Devers-San Bernardino No.1	n/a	Remove	LST	99
M88-T2	Devers-San Bernardino No.1	n/a	Remove	LST	102
PP#123274	Devers-El Casco	n/a	Remove	LST	96
PP#123275	Devers-El Casco	n/a	Remove	LST	95
PP#123276	Devers-El Casco	n/a	Remove	LST	96
PP#123277	Devers-El Casco	n/a	Remove	LST	95
PP#123278	Devers-El Casco	n/a	Remove	LST	85
PP#123279	Devers-El Casco	n/a	Remove	LST	94
PP#123280	Devers-El Casco	n/a	Remove	LST	86
PP#123281	Devers-El Casco	n/a	Remove	LST	86
PP#123282	Devers-El Casco	n/a	Remove	LST	95
PP#123283	Devers-El Casco	n/a	Remove	LST	96
PP#123284	Devers-El Casco	n/a	Remove	LST	96
PP#123285	Devers-El Casco	n/a	Remove	LST	85
PP#123286	Devers-El Casco	n/a	Remove	LST	84
PP#123287	Devers-El Casco	n/a	Remove	LST	85
PP#123288	Devers-El Casco	n/a	Remove	LST	85
PP#123289	Devers-El Casco	n/a	Remove	LST	85
PP#123290	Devers-El Casco	n/a	Remove	LST	86
PP#123291	Devers-El Casco	n/a	Remove	LST	85
PP#123292	Devers-El Casco	n/a	Remove	LST	95
PP#123293	Devers-El Casco	n/a	Remove	LST	96
PP#123294	Devers-El Casco	n/a	Remove	LST	95

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)	F4-6 cont.
PP#123295	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123296	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123297	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123298	Devers-El Casco	n/a	Remove	Wood Pole	73	
PP#123299	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123300	Devers-El Casco	n/a	Remove	Wood Pole	71	
PP#123301	Devers-El Casco	n/a	Remove	Wood Pole	73	
PP#123302	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123303	Devers-El Casco	n/a	Remove	Wood Pole	74	
PP#123304	Devers-El Casco	n/a	Remove	Wood Pole	70	
PP#123305	Devers-El Casco	n/a	Remove	Wood Pole	76	
PP#123306	Devers-El Casco	n/a	Remove	Wood Pole	71	
PP#123307	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123308	Devers-El Casco	n/a	Remove	Wood Pole	76	
PP#123309	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123310	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123311	Devers-El Casco	n/a	Remove	Wood Pole	72	
PP#123312	Devers-El Casco	n/a	Remove	Wood Pole	83	
PP#123313	Devers-El Casco	n/a	Remove	Wood Pole	88	
PP#123314	Devers-El Casco	n/a	Remove	Wood Pole	76	
PP#123315	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123316	Devers-El Casco	n/a	Remove	Wood Pole	76	
PP#123317	Devers-El Casco	n/a	Remove	Wood Pole	76	
PP#123318	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123318A	Devers-El Casco	n/a	Remove	Wood Pole	75	
PP#123319	Devers-El Casco	n/a	Remove	Wood Pole	82	
PP#123320	Devers-El Casco	n/a	Remove	Wood Pole	79	
PP#123321	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123322	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123323	Devers-El Casco	n/a	Remove	Wood Pole	79	
PP#123324	Devers-El Casco	n/a	Remove	Wood Pole	79	
PP#123325	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123326	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123327	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123328	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123329	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123330	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123331	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123332	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123333	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123334	Devers-El Casco	n/a	Remove	Wood Pole	79	
PP#123335	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123336	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123337	Devers-El Casco	n/a	Remove	Wood Pole	103	
PP#123338	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123339	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123340	Devers-El Casco	n/a	Remove	Wood Pole	75	
PP#123341	Devers-El Casco	n/a	Remove	Wood Pole	88	
PP#123342	Devers-El Casco	n/a	Remove	Wood Pole	80	
PP#123343	Devers-El Casco	n/a	Remove	Wood Pole	87	
PP#123344	Devers-El Casco	n/a	Remove	Wood Pole	78	
PP#123345	Devers-El Casco	n/a	Remove	Wood Pole	83	
PP#123346	Devers-El Casco	n/a	Remove	Wood Pole	65	
PP#123347	Devers-El Casco	n/a	Remove	Wood Pole	79	

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)	F4-6 cont.
PP#123348	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123349	Devers-El Casco	n/a	Remove	Wood Pole	82	
PP#123350	Devers-El Casco	n/a	Remove	Wood Pole	76	
PP#123351	Devers-El Casco	n/a	Remove	Wood Pole	77	
PP#123352	Devers-El Casco	n/a	Remove	Wood Pole	76	
PP#123353	Devers-El Casco	n/a	Remove	Wood Pole	47	
PP#123354	Devers-El Casco	n/a	Remove	Wood Pole	85	
PP#123355	Devers-El Casco	n/a	Remove	Wood Pole	90	
PP#123356	Devers-El Casco	n/a	Remove	Wood Pole	80	

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (feet)
SN01	Devers-San Bernardino	Devers-El Casco	Proposed	LST	137
SN02	Devers-San Bernardino	Devers-El Casco	Proposed	LST	132
SN03	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
SN04	Devers-San Bernardino	Devers-El Casco	Proposed	LST	151
SN05	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
SN06	Devers-San Bernardino	Devers-El Casco	Proposed	LST	134
SN07	Devers-San Bernardino	Devers-El Casco	Proposed	LST	189
SN08	Devers-San Bernardino	Devers-El Casco	Proposed	LST	158
SN09	Devers-San Bernardino	Devers-El Casco	Proposed	LST	163
SN10	Devers-San Bernardino	Devers-El Casco	Proposed	LST	133
SN11	Devers-San Bernardino	Devers-El Casco	Proposed	LST	149
SN12	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
SN13	Devers-San Bernardino	Devers-El Casco	Proposed	LST	165
SN14	Devers-San Bernardino	Devers-El Casco	Proposed	LST	165
SN15	Devers-San Bernardino	Devers-El Casco	Proposed	LST	187
SN16	Devers-San Bernardino	Devers-El Casco	Proposed	LST	166
SN17	Devers-San Bernardino	Devers-El Casco	Proposed	LST	155
SN18	Devers-San Bernardino	Devers-El Casco	Proposed	LST	155
SN19	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
SN20	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
SN21	Devers-San Bernardino	Devers-El Casco	Proposed	LST	155
SN22	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
SN23	Devers-San Bernardino	Devers-El Casco	Proposed	LST	186
SN24	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
SN27	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
SN28	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
SN29	Devers-San Bernardino	Devers-El Casco	Proposed	LST	140
SN30	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
SN31	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
SN32	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
SN34	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
SN35	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
SN36	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
SN37	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
SN38	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
SN39	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	113
SN40	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
SN41	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
SN42	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
SN43	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	113
SN44	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	113
SN44A	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
SN45	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
SN46	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
SN47	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	133
SN48	Devers-San Bernardino	Devers-El Casco	Proposed	LST	166
SN49	Devers-San Bernardino	Devers-El Casco	Proposed	LST	184
SN52	Devers-San Bernardino	Devers-El Casco	Proposed	LST	182
SN54	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	178
SS01	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	136
SS02	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	134
SS03	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
SS04	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
SS05	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
SS06	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
SS07	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
SS08	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
SS09	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
SS10	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	134
SS11	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
SS12	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
SS13	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
SS14	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	158
SS15	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	187
SS16	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	167
SS17	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154
SS18	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
SS19	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
SS20	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	152
SS21	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
SS22	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
SS23	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	185
SS24	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
SS27	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
SS28	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	140
SS29	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	140
SS30	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154
SS31	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
SS32	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
SS34	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
SS35	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
SS36	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
SS37	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
SS38	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
SS39	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
SS40	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
SS41	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
SS42	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
SS43	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
SS44	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
SS44A	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
SS45	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
SS46	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
SS47	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	133
SS48	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
SS49	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	183
SS52	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
SS54	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	178
M10-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	138
M10-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	127
M10-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	151
M11-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	148
M11-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	133
M11-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	155
M12-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	152
M12-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	135
M12-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	147
M12-T4	Devers-El Casco	Devers-Vista No.2	Remove	LST	154

F4-6  
cont.



Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M13-T1	Devers-El Casco	Devers-Vista No. 2	Remove	LST	156
M13-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	157
M13-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	142
M14-T1	Devers-El Casco	Devers-Vista No. 2	Remove	LST	127
M14-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	136
M14-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	132
M14-T4	Devers-El Casco	Devers-Vista No. 2	Remove	LST	127
M15-T1	Devers-El Casco	Devers-Vista No. 2	Remove	LST	122
M15-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	130
M15-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	130
M15-T4	Devers-El Casco	Devers-Vista No. 2	Remove	LST	121
M16-T1	Devers-El Casco	Devers-Vista No. 2	Remove	LST	127
M16-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	124
M16-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	145
M16-T4	Devers-El Casco	Devers-Vista No. 2	Remove	LST	172
M16-T5	Devers-Vista No.1	n/a	Remove	LST	54
M17-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	123
M17-T2	Devers-Vista No.1	Devers-Vista No. 2	Remove	LST	136
M68-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M68-T4	Devers-San Bernardino No.1	n/a	Remove	LST	90
M69-T1	Devers-San Bernardino No.1	n/a	Remove	LST	83
M69-T2	Devers-San Bernardino No.1	n/a	Remove	LST	90
M69-T3	Devers-San Bernardino No.1	n/a	Remove	LST	98
M70-T1	Devers-San Bernardino No.1	n/a	Remove	LST	77
M70-T2	Devers-San Bernardino No.1	n/a	Remove	LST	80
M70-T3	Devers-San Bernardino No.1	n/a	Remove	LST	78
M71-T1	Devers-San Bernardino No.1	n/a	Remove	LST	96
M71-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M71-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M71-T4	Devers-San Bernardino No.1	n/a	Remove	LST	108
M72-T1	Devers-San Bernardino No.1	n/a	Remove	LST	90
M72-T2	Devers-San Bernardino No.1	n/a	Remove	LST	96
M72-T3	Devers-San Bernardino No.1	n/a	Remove	LST	89
M73-T1	Devers-San Bernardino No.1	n/a	Remove	LST	109
M73-T2	Devers-San Bernardino No.1	n/a	Remove	LST	90
M73-T3	Devers-San Bernardino No.1	n/a	Remove	LST	108
M74-T1	Devers-San Bernardino No.1	n/a	Remove	LST	80
M74-T2	Devers-San Bernardino No.1	n/a	Remove	LST	85
M74-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M74-T4	Devers-San Bernardino No.1	n/a	Remove	LST	80
M75-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M75-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M75-T3	Devers-San Bernardino No.1	n/a	Remove	LST	91
M75-T4	Devers-San Bernardino No.1	n/a	Remove	LST	84
M75-T5	Devers-San Bernardino No.1	n/a	Remove	LST	84
M76-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M76-T2	Devers-San Bernardino No.1	n/a	Remove	LST	79
M76-T3	Devers-San Bernardino No.1	n/a	Remove	LST	92
M76-T4	Devers-San Bernardino No.1	n/a	Remove	LST	78
M77-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M77-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M8-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	135
M8-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	148
M8-T4	Devers-El Casco	Devers-Vista No. 2	Remove	LST	148

F4-6  
cont.



Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M9-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	156
M9-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	150
M9-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	125
PP#123357	Devers-El Casco	n/a	Remove	Wood Pole	92
PP#123358	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123359	Devers-El Casco	n/a	Remove	Wood Pole	67
PP#123360	Devers-El Casco	n/a	Remove	Wood Pole	56
T155	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T156	Devers-Vista No.1	n/a	Remove	Wood Pole	103
T157	Devers-Vista No.1	n/a	Remove	Wood Pole	101
T158	Devers-Vista No.1	n/a	Remove	Wood Pole	84
T159	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T159A	Devers-Vista No.1	n/a	Remove	Wood Pole	74
T160	Devers-Vista No.1	n/a	Remove	Wood Pole	66
T161	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T162	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T163	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T164	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T165	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T166	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T167	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T168	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T169	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T170	Devers-Vista No.1	n/a	Remove	Wood Pole	64
T171	Devers-Vista No.1	n/a	Remove	Wood Pole	80
T172	Devers-Vista No.1	n/a	Remove	Wood Pole	76
T173	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T174	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T175	Devers-Vista No.1	n/a	Remove	Wood Pole	91
T181	Devers-Vista No.1	n/a	Remove	Wood Pole	83
T182	Devers-Vista No.1	n/a	Remove	Wood Pole	84
T183	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T184	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T185	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T186	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T187	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T188	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T189	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T190	Devers-Vista No.1	n/a	Remove	Wood Pole	76
T191	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T192	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T193	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T194	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T195	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T196	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T197	Devers-Vista No.1	n/a	Remove	Wood Pole	75
T198	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T199	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T200	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T201	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T202	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T203	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T204	Devers-Vista No.1	n/a	Remove	Wood Pole	68
T205	Devers-Vista No.1	n/a	Remove	Wood Pole	77

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
T206	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T207	Devers-Vista No.1	n/a	Remove	Wood Pole	87
T208	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T209	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T210	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T211	Devers-Vista No.1	n/a	Remove	Wood Pole	84
T212	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T213	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T214	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T215	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T216	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T217	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T217A	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T218	Devers-Vista No.1	n/a	Remove	Wood Pole	79
4175193E	Devers-Vista No.1	n/a	Remove	TSP	112
4175194E	Devers-Vista No.1	n/a	Remove	TSP	107
4175195E	Devers-Vista No.1	n/a	Remove	TSP	131
4175196E	Devers-Vista No.1	n/a	Remove	TSP	148
4175197E	Devers-Vista No.1	n/a	Remove	TSP	117

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
6N07	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	188
6N08	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	188
6N09	Devers-San Bernardino	Devers-El Casco	Proposed	LST	184
6N10	Devers-San Bernardino	Devers-El Casco	Proposed	LST	184
6N11	Devers-San Bernardino	Devers-El Casco	Proposed	LST	146
6N12	Devers-San Bernardino	Devers-El Casco	Proposed	LST	143
6N13	Devers-San Bernardino	Devers-El Casco	Proposed	LST	147
6N14	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
6N15	Devers-San Bernardino	Devers-El Casco	Proposed	LST	154
6N16	Devers-San Bernardino	Devers-El Casco	Proposed	LST	143
6N17	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
6N18	Devers-San Bernardino	Devers-El Casco	Proposed	LST	148
6N19	Devers-San Bernardino	Devers-El Casco	Proposed	LST	151
6N20	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
6N21	Devers-San Bernardino	Devers-El Casco	Proposed	LST	156
6N22	Devers-San Bernardino	Devers-El Casco	Proposed	LST	151
6N23	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
6N24	Devers-San Bernardino	Devers-El Casco	Proposed	LST	145
6N25	Devers-San Bernardino	Devers-El Casco	Proposed	LST	153
6N26	Devers-San Bernardino	Devers-El Casco	Proposed	LST	137
6N27	Devers-San Bernardino	Devers-El Casco	Proposed	LST	183
6N28	Devers-San Bernardino	Devers-El Casco	Proposed	LST	191
6N29	Devers-San Bernardino	Devers-El Casco	Proposed	LST	123
6N30	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
6N31	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	158
6N32	Devers-San Bernardino	Devers-El Casco	Proposed	LST	179
6N34	Devers-San Bernardino	Devers-El Casco	Proposed	LST	166
6N35	Devers-San Bernardino	Devers-El Casco	Proposed	LST	188
6N37	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
6N38	Devers-San Bernardino	Devers-El Casco	Proposed	LST	160
6N39	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
6N40	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
6N41	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
6N42	Devers-San Bernardino	Devers-El Casco	Proposed	LST	137
6N43	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
6N44	Devers-San Bernardino	Devers-El Casco	Proposed	LST	148
6N45	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
6N46	Devers-San Bernardino	Devers-El Casco	Proposed	LST	163
6N47	Devers-San Bernardino	Devers-El Casco	Proposed	LST	182
6N48	Devers-San Bernardino	Devers-El Casco	Proposed	LST	162
6507	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	188
6508	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	188
6509	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
6510	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	184
6511	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	145
6512	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
6513	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	148
6514	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
6515	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	135
6516	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	138
6517	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
6518	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	131
6519	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
6520	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153

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cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
6521	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154
6522	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	138
6523	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	136
6524	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
6525	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
6526	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	121
6527	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
6528	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	191
6528A	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	180
6529	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
6530	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	122
6530A	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
6531	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	187
6531A	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	180
6532	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
6533	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
6534	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
6535	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
6536	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
6537	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	161
6538	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
6539	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
6540	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
6541	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	130
6542	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	120
6543	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	144
6544	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	149
6545	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	151
6546	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
6547	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
6548	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
DEVERS 6 LOW	Devers-Vista No.2	n/a	Modify	Rack	65
DEVERS 8 HIGH	Devers-El Casco	n/a	Modify	Rack	103
DEVERS 8 LOW	Devers-Vista No.1	n/a	Modify	Rack	60
DEVERS 9 LOW	Devers-San Bernardino	n/a	Modify	Rack	60
M0-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	187
M0-T2(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	154
M0-T2A	Devers-El Casco	Devers-Vista No.2	Remove	LST	165
M0-T3(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	162
M0-T4(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	150
M0-T5(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	145
M1-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	140
M1-T2(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	146
M1-T3(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	133
M1-T4(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	136
M2-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	129
M2-T2(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	137
M2-T3(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	138
M2-T4(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	134
M3-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	138
M3-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	115
M45-T1X	Devers-Vista No.1	n/a	Remove	LST	107
M45-T2X	Devers-Vista No.1	Devers-San Bernardino	Remove	LST	157
M45-T3X	Devers-Vista No.1	Devers-San Bernardino	Remove	LST	157

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M4-T1	Devers-El Casco	Devers-Vista No. 2	Remove	LST	129
M4-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	118
M4-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	117
M5-T1(1)	Devers-El Casco	Devers-Vista No. 2	Remove	LST	138
M5-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	156
M5-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	149
M60-T1X	Devers-Vista No.1	Devers-San Bernardino	Remove	LST	157
M60-T2X	Devers-San Bernardino	n/a	Remove	LST	107
M60-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M61-T1	Devers-San Bernardino No.1	n/a	Remove	LST	89
M61-T2	Devers-San Bernardino No.1	n/a	Remove	LST	90
M61-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M61-T4	Devers-San Bernardino No.1	n/a	Remove	LST	78
M62-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M62-T2	Devers-San Bernardino No.1	n/a	Remove	LST	78
M62-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M62-T4	Devers-San Bernardino No.1	n/a	Remove	LST	85
M63-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M63-T2	Devers-San Bernardino No.1	n/a	Remove	LST	78
M64-T1	Devers-San Bernardino No.1	n/a	Remove	LST	79
M64-T2	Devers-San Bernardino No.1	n/a	Remove	LST	82
M64-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M65-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M65-T2	Devers-San Bernardino No.1	n/a	Remove	LST	81
M65-T3	Devers-San Bernardino No.1	n/a	Remove	LST	89
M66-T1	Devers-San Bernardino No.1	n/a	Remove	LST	82
M66-T2	Devers-San Bernardino No.1	n/a	Remove	LST	88
M66-T3	Devers-San Bernardino No.1	n/a	Remove	LST	101
M66-T4	Devers-San Bernardino No.1	n/a	Remove	LST	89
M67-T1	Devers-San Bernardino No.1	n/a	Remove	LST	90
M67-T2	Devers-San Bernardino No.1	n/a	Remove	LST	77
M67-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M68-T1	Devers-San Bernardino No.1	n/a	Remove	LST	83
M68-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M6-T1	Devers-El Casco	Devers-Vista No. 2	Remove	LST	158
M6-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	148
M6-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	155
M7-T1	Devers-El Casco	Devers-Vista No. 2	Remove	LST	145
M7-T2	Devers-El Casco	Devers-Vista No. 2	Remove	LST	128
M7-T3	Devers-El Casco	Devers-Vista No. 2	Remove	LST	137
M7-T4	Devers-El Casco	Devers-Vista No. 2	Remove	LST	128
M8-T1	Devers-El Casco	Devers-Vista No. 2	Remove	LST	137
T219	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T220	Devers-Vista No.1	n/a	Remove	Wood Pole	91
T220A	Devers-Vista No.1	n/a	Remove	Wood Pole	102
T221	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T222	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T223	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T224	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T225	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T226	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T227	Devers-Vista No.1	n/a	Remove	Wood Pole	67
T228	Devers-Vista No.1	n/a	Remove	Wood Pole	61
T229	Devers-Vista No.1	n/a	Remove	Wood Pole	78

F4-6  
cont.

Comment Set F4 – Southern California Edison (cont.)

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)	F4-6 cont.
T230	Devers-Vista No.1	n/a	Remove	Wood Pole	79	
T231	Devers-Vista No.1	n/a	Remove	Wood Pole	79	
T232	Devers-Vista No.1	n/a	Remove	Wood Pole	82	
T233	Devers-Vista No.1	n/a	Remove	Wood Pole	72	
T234	Devers-Vista No.1	n/a	Remove	Wood Pole	78	
T235	Devers-Vista No.1	n/a	Remove	Wood Pole	82	
T236	Devers-Vista No.1	n/a	Remove	Wood Pole	94	
T237	Devers-Vista No.1	n/a	Remove	Wood Pole	78	
T238	Devers-Vista No.1	n/a	Remove	Wood Pole	89	
T239	Devers-Vista No.1	n/a	Remove	Wood Pole	89	
T240	Devers-Vista No.1	n/a	Remove	Wood Pole	79	
T241	Devers-Vista No.1	n/a	Remove	Wood Pole	80	
T242	Devers-Vista No.1	n/a	Remove	Wood Pole	81	
T243	Devers-Vista No.1	n/a	Remove	Wood Pole	78	
T244	Devers-Vista No.1	n/a	Remove	Wood Pole	76	
T245	Devers-Vista No.1	n/a	Remove	Wood Pole	81	
T246	Devers-Vista No.1	n/a	Remove	Wood Pole	80	
T247	Devers-Vista No.1	n/a	Remove	Wood Pole	81	
T247A	Devers-Vista No.1	n/a	Remove	Wood Pole	77	
T248	Devers-Vista No.1	n/a	Remove	Wood Pole	73	
T249	Devers-Vista No.1	n/a	Remove	Wood Pole	84	
T250	Devers-Vista No.1	n/a	Remove	LST	79	
T251	Devers-Vista No.1	n/a	Remove	LST	80	
T252	Devers-Vista No.1	n/a	Remove	Wood Pole	81	
T252A	Devers-Vista No.1	n/a	Remove	Wood Pole	81	
T253	Devers-Vista No.1	n/a	Remove	Wood Pole	81	
T254	Devers-Vista No.1	n/a	Remove	Wood Pole	105	
T255	Devers-Vista No.1	n/a	Remove	Wood Pole	83	
T256	Devers-Vista No.1	n/a	Remove	Wood Pole	78	
T257	Devers-Vista No.1	n/a	Remove	Wood Pole	78	
T258	Devers-Vista No.1	n/a	Remove	Wood Pole	78	
T259	Devers-Vista No.1	n/a	Remove	Wood Pole	79	
T260	Devers-Vista No.1	n/a	Remove	Wood Pole	79	
T261	Devers-Vista No.1	n/a	Remove	Wood Pole	77	
T262	Devers-Vista No.1	n/a	Remove	Wood Pole	78	
T263	Devers-Vista No.1	n/a	Remove	Wood Pole	79	
T264	Devers-Vista No.1	n/a	Remove	Wood Pole	77	
T265	Devers-Vista No.1	n/a	Remove	Wood Pole	76	
T266	Devers-Vista No.1	n/a	Remove	Wood Pole	85	
T267	Devers-Vista No.1	n/a	Remove	Wood Pole	82	
T268	Devers-Vista No.1	n/a	Remove	Wood Pole	78	
T269	Devers-Vista No.1	n/a	Remove	Wood Pole	81	
T270	Devers-Vista No.1	n/a	Remove	Wood Pole	79	
T271	Devers-Vista No.1	n/a	Remove	Wood Pole	80	



Comment Set F4 – Southern California Edison (cont.)

Segment 1	
From Tower	To Tower
3N65	1E03
1W02	1W03

Segment 2	
From Tower	To Tower
3S65	2N01
2N01	2N02
2N02	2N04
2N04	2N06
2N06	2N07
2N07	2N08
2N08	2N10
2N10	2N11
2N11	2N12
2N12	2N14
2N15	2N16
2N18	2N20
2N32	2N33
2N35	2N36

Segment 3	
From Tower	To Tower
3N07	3N08
3N08	3N10
3N10	3N12
3N15	3N16
3N16	3N17
3N17	3N19
3N20	3N21
3N31	3N32
3N32	3N33
3N33	3N35
3N35	3N36
3N36	3N37
3N37	3N28
3N39	3N40
3N40	3N41
3N41	3N42
3N43	3N44
3N44	3N46
3N46	3N48
3N48	3N50
3N50	3N51
3N51	3N53
3N57	3N59
3N62	3N63
3N63	3N64

3N64	3N65
3S01	3S02
3S02	3S03
3S03	3S04
3S04	3S06
3S07	3S08
3S08	3S10
3S10	3S12
3S15	3S16
3S16	3S17
3S17	3S19
3S20	3S21
3S31	3S32
3S32	3S33
3S33	3S35
3S35	3S36
3S36	3S37
3S37	3S38
3S39	3S40
3S40	3S41
3S41	3S42
3S43	3S44
3S44	3S46
3S46	3S48
3S48	3S50
3S50	3S51
3S51	3S53
3S57	3S59
3S62	3S63
3S63	3S64
3S64	3S65

Segment 4	
From Tower	To Tower
4N01	4N02
4N02	4N03
4N03	4N04
4N04	4N05
4N10	4N12
4N12	4N13
4N37	4N38
4N54	4N55
4N55	4N56
4N56	4N57
4N57	4N58
4S01	4S02
4S02	4S03
4S03	4S04

4S04	4S05
4S10	4S12
4S12	4S13
4S37	4S38
4S54	4S55
4S55	4S56
4S56	4S57
4S57	4S58
4S58	4S59

Segment 5	
From Tower	To Tower
5N07	5N08
5N14	5N15
5N49	5N52
5N52	5N54
5S07	5S08
5S14	5S15
5S49	5S52
5S52	5S54

Segment 6	
From Tower	To Tower
6N27	6N28
6N28	6N29
6N29	6N30
6N30	6N31
6N31	6N32
6N34	6N35
6N35	6N37
6S27	6S28
6S28	6S28A
6S28A	6S29

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Comment Set F4 – Southern California Edison (cont.)

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (ASL)	Total Height (AMSL)	Filing Required	Marking / Lighting	City	Airspace Issues	Filing Note
1W00	N34 01 56.20	W117 14 31.00	1653	141	1794	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1W01	N34 01 12.00	W117 14 28.00	1634	98	1732	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1W02	N34 01 56.07	W117 14 24.00	1621	98	1719	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1W03	N34 02 10.33	W117 14 22.32	1552	144	1696	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1E03	N34 02 10.40	W117 14 21.54	1556	141	1697	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1W04	N34 02 21.53	W117 14 22.41	1301	154	1456	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E04	N34 02 21.54	W117 14 21.70	1301	156	1457	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E05	N34 02 30.01	W117 14 21.71	1267	140	1407	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W05	N34 02 30.01	W117 14 22.41	1268	141	1409	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E06	N34 02 35.88	W117 14 21.71	1253	132	1385	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W06	N34 02 35.88	W117 14 22.41	1254	132	1386	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E08	N34 02 45.28	W117 14 21.72	1218	135	1354	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W08	N34 02 45.28	W117 14 22.40	1219	135	1354	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E10	N34 02 55.16	W117 14 21.69	1185	158	1344	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W10	N34 02 55.16	W117 14 22.42	1185	158	1344	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W11	N34 03 2.65	W117 14 22.44	1165	146	1311	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E11	N34 03 2.66	W117 14 21.73	1166	146	1313	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E12	N34 03 10.33	W117 14 21.76	1152	131	1283	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W12	N34 03 10.33	W117 14 22.45	1150	132	1282	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E13	N34 03 16.94	W117 14 21.78	1145	126	1271	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W13	N34 03 16.99	W117 14 22.46	1145	125	1270	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E15	N34 03 25.22	W117 14 20.01	1139	128	1268	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W15	N34 03 25.26	W117 14 20.64	1139	128	1267	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E16	N34 03 31.09	W117 14 20.01	1138	119	1257	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W16	N34 03 31.09	W117 14 20.71	1137	120	1256	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W17	N34 03 38.44	W117 14 20.80	1132	129	1260	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E17	N34 03 38.44	W117 14 20.01	1133	129	1261	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E18	N34 03 45.20	W117 14 19.85	1128	147	1275	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W18	N34 03 45.21	W117 14 20.63	1128	147	1276	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E19	N34 03 51.66	W117 14 19.70	1126	144	1270	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W19	N34 03 51.66	W117 14 20.46	1125	144	1269	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W20	N34 03 57.05	W117 14 20.46	1123	157	1279	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E20	N34 03 57.06	W117 14 19.70	1123	157	1279	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W21	N34 04 5.74	W117 14 20.45	1120	151	1271	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E21	N34 04 05.74	W117 14 19.69	1121	149	1271	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E22	N34 04 16.04	W117 14 19.68	1119	132	1251	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W22	N34 04 14.04	W117 14 20.45	1119	133	1251	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E23	N34 04 21.45	W117 14 19.68	1117	126	1243	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W23	N34 04 21.45	W117 14 20.44	1117	126	1242	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W24	N34 04 29.75	W117 14 20.44	1116	126	1241	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E24	N34 04 29.76	W117 14 19.67	1116	126	1241	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W25	N34 04 37.56	W117 14 20.43	1115	138	1253	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E25	N34 04 37.57	W117 14 19.67	1116	138	1253	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E26	N34 04 41.18	W117 14 20.46	1118	156	1274	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1W26	N34 04 41.18	W117 14 20.43	1117	156	1273	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E27	N34 04 42.47	W117 14 19.24	1120	133	1253	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues
1E28	N34 04 42.46	W117 14 17.92	1120	133	1253	Yes	No	Redlands	Requires Filing - No Airspace Issues	Requires Filing - No Airspace Issues

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Comment Set F4 – Southern California Edison (cont.)

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking / Lighting	City	Airspace Issues	Filing Note
2N01 (EX.)	N34 01 56.14	W117 14 27.80	1616	164	1780	No	Yes	Redlands	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N02 (EX.)	N34 01 59.82	W117 14 32.24	1622	172	1794	No	Yes	Redlands	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N04	N34 02 07.47	W117 14 51.43	1560	189	1749	No	Yes	Loma Linda	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N06	N34 02 13.54	W117 15 06.60	1535	143	1678	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N07	N34 02 14.23	W117 15 15.42	1509	167	1676	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N08	N34 02 14.70	W117 15 22.17	1553	124	1677	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N10	N34 02 15.67	W117 15 36.11	1464	161	1625	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N11	N34 02 16.16	W117 15 42.94	1514	139	1653	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N12	N34 02 16.84	W117 15 52.97	1571	137	1708	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N14	N34 02 04.35	W117 15 57.60	1499	113	1612	No	Yes	Loma Linda	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N15	N34 02 03.99	W117 16 11.17	1364	158	1522	No	Yes	Loma Linda	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N16	N34 02 03.66	W117 16 23.71	1395	113	1508	No	No	Colton		
2N17	N34 02 09.61	W117 16 30.10	1411	153	1564	No	Yes	Colton	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N18	N34 02 20.63	W117 16 41.36	1277	184	1461	No	No	Colton		
2N20	N34 02 22.64	W117 16 53.96	1150	182	1332	No	No	Colton		
2N21	N34 02 24.50	W117 17 05.13	1126	181	1307	No	No	Colton		
2N22	N34 02 27.61	W117 17 19.63	1225	134	1359	No	No	Colton		
2N23	N34 02 30.83	W117 17 26.71	1228	157	1385	No	No	Colton		
2N25	N34 02 34.02	W117 17 40.14	1098	157	1255	No	No	Colton		
2N26	N34 02 37.05	W117 17 52.43	1042	14	1056	No	No	Colton		
2N28 (EX.)	N34 02 41.60	W117 18 01.83	1003	156	1159	No	No	Colton		
2N29	N34 02 42.29	W117 18 10.35	996	150	1146	No	No	Colton		
2N30 (EX.)	N34 02 42.71	W117 18 15.71	1027	131	1158	No	No	Colton		
2N31 (EX.)	N34 02 43.75	W117 18 26.80	1015	147	1162	No	No	Colton		
2N32	N34 02 44.08	W117 18 31.27	982	155	1137	No	No	Colton		
2N33 (EX.)	N34 02 40.97	W117 18 44.98	928	158	1086	No	No	Colton		
2N34	N34 02 39.05	W117 18 53.16	923	181	1104	No	No	Colton		
2N35	N34 02 37.06	W117 19 01.45	920	155	1075	No	No	Colton		
2N36	N34 02 30.63	W117 19 03.64	1053	143	1196	No	No	Colton		
2N38	N34 02 31.29	W117 19 07.22	1041	168	1209	No	No	Colton		
2N37	N34 02 31.10	W117 19 07.25	1041	168	1209	No	No	Colton		

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cont.

Structure ID	Latitude	Longitude (NAD)	Site Elevation (m)	Structure Height (m)	Total Height (m)	Filling Required	Municipal/Lighting	City	Access Issues	Filing Notes
0001	N 13° 07' 48.13	W 11° 07' 45.18	1054.26	132.52	1187.65	NO	NO	Andersland		
0001	N 13° 07' 51.05	W 11° 07' 58.72	1216.46	178	2393.66	NO	NO	Andersland		
0002	N 13° 07' 53.41	W 11° 07' 56.66	1248.51	138	2396.52	NO	NO	Andersland		
0003	N 13° 07' 55.81	W 11° 07' 56.12	1263.38	178	2441.37	NO	NO	Andersland		
0004	N 13° 07' 49.38	W 11° 07' 48.68	1216.61	161	2378.19	NO	NO	Andersland		
0005	N 13° 07' 50.31	W 11° 07' 50.14	1275.20	178	2453.38	NO	NO	Andersland		
0006	N 13° 07' 47.40	W 11° 07' 48.58	1207.62	181.26	2478.97	NO	NO	Andersland		
0007	N 13° 07' 59.22	W 11° 07' 45.50	1255.19	125	2380.28	NO	NO	Andersland		
0008	N 13° 07' 51.76	W 11° 07' 46.02	1264.03	144	2408.77	NO	NO	Andersland		
0009	N 13° 07' 44.18	W 11° 07' 41.25	1205.23	156.4	2361.63	NO	NO	Andersland		
0010	N 13° 07' 47.11	W 11° 07' 46.17	1261.71	178	2439.77	NO	NO	Andersland		
0027	N 13° 07' 56.92	W 11° 07' 50.35	1206.38	195.2	2398.66	NO	NO	Andersland		
0028	N 13° 07' 56.34	W 11° 07' 52.21	1258.22	145.2	2393.44	NO	NO	Andersland		
0029	N 13° 07' 59.83	W 11° 07' 51.38	1411.1	141.1	2552.21	NO	NO	Andersland		
0030	N 13° 07' 45.38	W 11° 07' 40.82	1214.94	181.2	2396.36	NO	NO	Andersland		
0031	N 13° 07' 56.94	W 11° 07' 46.42	1224.2	178	2403.16	NO	NO	Andersland		
0032	N 13° 07' 50.32	W 11° 07' 46.41	1260.75	178	2439.25	NO	NO	Andersland		
0033	N 13° 07' 50.32	W 11° 07' 46.41	1260.75	178	2439.25	NO	NO	Andersland		
0034	N 13° 07' 59.37	W 11° 07' 51.83	1205.15	134.5	2339.64	NO	NO	Andersland		
0035	N 13° 07' 46.08	W 11° 07' 46.14	1088.78	178	1266.78	NO	NO	Andersland		
0036	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0037	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0038	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0039	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0040	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0041	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0042	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0043	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0044	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0045	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0046	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0047	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0048	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0049	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		
0050	N 13° 07' 58.36	W 11° 07' 46.82	1099.78	181.5	1281.49	NO	NO	Andersland		

Comment Set F4 – Southern California Edison (cont.)

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (ft)	Total Height (ft)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
1540	N34° 59' 54.09"	W113° 10' 37.12"	1894.08	132.3	2026.38	NO	NO	Redlands		
1541	N34° 00' 01.51"	W113° 10' 36.21"	1772.69	191.4	1968.09	NO	NO	Redlands		
1541	N34° 00' 00.95"	W113° 10' 36.62"	1775.91	192.2	1968.11	NO	NO	Redlands		
1542	N34° 00' 08.61"	W113° 10' 49.91"	1904.16	144.1	2118.26	NO	NO	Redlands		
1542	N34° 00' 08.28"	W113° 10' 50.54"	1905.1	134.7	2039.98	NO	NO	Redlands		
1543	N34° 00' 11.17"	W113° 10' 54.86"	1901.55	136	2037.55	NO	NO	Redlands		
1543	N34° 00' 10.58"	W113° 10' 54.98"	1901.19	136.1	2037.29	NO	NO	Redlands		
1544	N34° 00' 16.35"	W113° 11' 6.080"	1812.62	162.9	1975.82	NO	NO	Redlands		
1544	N34° 00' 17.03"	W113° 11' 06.15"	1810.11	162.9	1973.01	NO	NO	Redlands		
1546	N34° 00' 24.00"	W113° 11' 19.64"	1745.08	128	1873.08	NO	NO	Redlands		
1546	N34° 00' 23.49"	W113° 11' 19.85"	1746.87	128	1873.87	NO	NO	Redlands		
1548	N34° 00' 31.62"	W113° 11' 34.59"	1668.22	128.4	1796.62	NO	NO	Redlands		
1548	N34° 00' 31.31"	W113° 11' 35.01"	1673.66	128.6	1801.66	NO	NO	Redlands		
1550	N34° 00' 40.96"	W113° 11' 52.23"	1695.67	182.3	1877.97	NO	NO	Redlands		
1550	N34° 00' 40.53"	W113° 11' 52.77"	1700.11	181.1	1881.21	NO	NO	Redlands		
1551	N34° 00' 49.09"	W113° 12' 08.04"	1665.21	163.9	1829.11	NO	NO	Redlands		
1551	N34° 00' 48.63"	W113° 12' 08.29"	1668.79	159.3	1827.98	NO	NO	Redlands		
1553	N34° 00' 54.51"	W113° 12' 19.59"	1588.96	153	1741.96	NO	NO	Redlands		
1553	N34° 00' 55.17"	W113° 12' 19.67"	1590.17	153	1743.17	NO	NO	Redlands		
1555	N34° 01' 02.89"	W113° 12' 34.57"	1550.54	152.2	1712.74	NO	NO	Redlands		
1555	N34° 01' 02.41"	W113° 12' 34.82"	1560.15	151.5	1716.65	NO	NO	Redlands		
1556	N34° 01' 08.42"	W113° 12' 45.21"	1603	139.25	1740.05	NO	NO	Redlands		
1556	N34° 01' 07.95"	W113° 12' 45.56"	1600.15	140	1740.15	NO	NO	Redlands		
1557	N34° 01' 13.71"	W113° 12' 55.49"	1594.63	166	1760.63	NO	NO	Redlands		
1559	N34° 01' 13.14"	W113° 12' 55.83"	1600.95	161.7	1763.65	NO	NO	Redlands		
1559	N34° 01' 21.85"	W113° 13' 11.09"	1605.64	158.7	1759.14	NO	NO	Redlands		
1559	N34° 01' 21.38"	W113° 13' 11.44"	1607.68	155.5	1761.18	NO	NO	Redlands		
1560	N34° 01' 27.47"	W113° 13' 21.91"	1592.7	161	1753.7	NO	NO	Redlands		
1560	N34° 01' 27.00"	W113° 13' 22.27"	1594.47	161.6	1756.07	NO	NO	Redlands		
1561	N34° 01' 32.19"	W113° 13' 31.03"	1623.25	151.7	1774.95	NO	NO	Redlands		
1561	N34° 01' 31.72"	W113° 13' 31.38"	1617.88	151.6	1769.48	NO	NO	Redlands		
1562	N34° 01' 36.56"	W113° 13' 40.37"	1652.91	166.4	1809.31	YES	YES	Redlands	Cat D Traffic	Filing Required Airspace Issues
1562	N34° 01' 36.50"	W113° 13' 40.77"	1648.21	161.3	1829.51	YES	YES	Redlands	Cat D Traffic	Filing Required Airspace Issues
1563	N34° 01' 45.78"	W113° 13' 56.41"	1677.88	124.3	1797.18	YES	YES	Redlands	Cat D Traffic	Filing Required Airspace Issues
1563	N34° 01' 44.72"	W113° 13' 56.68"	1679.35	124.3	1801.65	YES	YES	Redlands	Cat D Traffic	Filing Required Airspace Issues
1564	N34° 01' 49.44"	W113° 14' 07.11"	1603.34	162.2	1766.54	YES	YES	Redlands	Cat D Traffic	Filing Required Airspace Issues
1564	N34° 01' 48.00"	W113° 14' 7.32"	1611	161.7	1779.81	YES	YES	Redlands	Cat D Traffic	Filing Required Airspace Issues
1565	N34° 01' 54.01"	W113° 14' 17.95"	1588.52	139.64	1728.16	YES	YES	Redlands	Cat D Traffic	Filing Required Airspace Issues
1565	N34° 01' 53.49"	W113° 14' 18.45"	1589.1	140	1769.1	YES	YES	Redlands	Cat D Traffic	Filing Required Airspace Issues

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cont.

Comment Set F4 – Southern California Edison (cont.)

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (ADL)	Total Height (AMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
4N01	N33 56 50.85	W116 52 40.87	2649.7	160	2849.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N01	N33 56 50.35	W116 52 40.87	2646.7	170	2856.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N02	N33 56 50.69	W116 52 49.68	2768.4	180	2978.4	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N02	N33 56 52.23	W116 52 49.97	2805	150	2955	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N03	N33 56 50.42	W116 53 06.25	2888	165	3053	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N03	N33 56 50.92	W116 53 06.31	2892.8	154	3046.8	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N04	N33 56 48.72	W116 53 25.27	2845.8	190	3035.8	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N04	N33 56 49.21	W116 53 25.32	2851.5	190	3041.5	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N05	N33 56 46.74	W116 53 41.31	3025.7	125	3150.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N05	N33 56 47.34	W116 53 41.96	3027.4	125	3152.4	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N06	N33 56 47.26	W116 53 52.03	3012.1	141.6	3153.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N06	N33 56 46.76	W116 53 52.04	3010.1	139.6	3169.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N07	N33 56 47.27	W116 54 03.43	2950.1	122.6	3082.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N07	N33 56 46.78	W116 54 03.41	2949.6	126.6	3076.2	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N08	N33 56 47.29	W116 54 14.60	2978.2	122	3100.2	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N08	N33 56 46.80	W116 54 14.60	2978.1	116	3094.1	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N09	N33 56 47.20	W116 54 25.02	2987.2	174.6	3161.8	No	No	Banning		
4N09	N33 56 46.81	W116 54 25.81	2985.6	159.6	3145.2	No	No	Banning		
4N10	N33 56 47.31	W116 54 36.20	3039.2	113	3152.2	No	No	Banning		
4N10	N33 56 46.82	W116 54 36.20	3037	116	3153	No	No	Banning		
4N12	N33 56 47.10	W116 54 54.85	2936.2	130	3066.2	No	No	Banning		
4N12	N33 56 47.63	W116 54 54.98	2927.9	138	3065.9	No	No	Banning		
4N13	N33 56 47.55	W116 55 04.85	2941.1	113	3054.1	No	No	Banning		
4N13	N33 56 48.05	W116 55 04.86	2948.7	125.5	3074.2	No	No	Banning		
4N14	N33 56 47.47	W116 55 15.49	2781.9	159.6	2943.5	No	No	Banning		
4N14	N33 56 47.97	W116 55 15.50	2785.2	162.6	2947.8	No	No	Banning		
4N15	N33 56 47.66	W116 55 26.81	2761.4	124.6	2886	No	No	Banning		
4N15	N33 56 47.47	W116 55 26.81	2738.9	129.6	2868.5	No	No	Banning		
4N16	N33 56 47.37	W116 55 37.68	2706	126.6	2832.6	No	No	Banning		
4N16	N33 56 46.88	W116 55 37.68	2703.6	126.6	2830.4	No	No	Banning		
4N17	N33 56 47.35	W116 55 48.00	2701.1	132.6	2833.7	No	No	Banning		
4N17	N33 56 46.85	W116 55 48.00	2698.9	135.6	2834.5	No	No	Banning		
4N18	N33 56 47.34	W116 55 59.72	2692.5	132.6	2825.1	No	No	Banning		
4N18	N33 56 46.84	W116 55 59.72	2690.7	132.6	2823.3	No	No	Banning		
4N19	N33 56 47.32	W116 56 10.68	2642.2	124.6	2766.8	No	No	Banning		
4N19	N33 56 46.83	W116 56 10.68	2680.4	129.6	2810	No	No	Banning		
4N20	N33 56 46.82	W116 56 21.28	2685.1	124.6	2811.7	No	No	Banning		
4N20	N33 56 47.31	W116 56 21.28	2686.2	129.6	2815.8	No	No	Banning		
4N21	N33 56 47.29	W116 56 32.65	2694	135.6	2829.6	No	No	Banning		
4N21	N33 56 46.80	W116 56 32.65	2692	138.6	2830.6	No	No	Banning		
4N22	N33 56 47.34	W116 56 43.64	2695.1	126.6	2821.7	No	No	Banning		
4N22	N33 56 46.84	W116 56 43.68	2693.7	123.6	2817.3	No	No	Banning		
4N23	N33 56 47.56	W116 56 54.95	2698.4	134	2832.4	No	No	Banning		
4N23	N33 56 47.07	W116 56 55.09	2698.3	137	2835.3	No	No	Banning		
4N24	N33 56 50.79	W116 57 08.80	2708.5	159.6	2868.1	No	No	Banning		
4N24	N33 56 50.32	W116 57 8.95	2707.4	153.6	2861	No	No	Banning		
4N25	N33 56 53.97	W116 57 22.58	2711.5	145	2856.5	No	No	Banning		
4N25	N33 56 53.44	W116 57 23.01	2710.9	151	2861.9	No	No	Banning		
4N26	N33 56 55.84	W116 57 37.82	2706.8	174.6	2881.4	No	No	Banning		
4N26	N33 56 54.98	W116 57 37.82	2706	165.6	2871.6	No	No	Banning		
4N27	N33 56 57.18	W116 57 54.13	2698.6	174.6	2873.2	No	No	Banning		

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Comment Set F4 – Southern California Edison (cont.)

4527	N33 56 56.69	W116 57 54.24	2607.1	159.6	2856.7	No	No	Banning
4N29	N33 56 58.95	W116 58 10.39	2679.0	174.6	2854.5	No	No	Banning
4529	N33 56 58.45	W116 58 10.46	2679.5	174.6	2854.1	No	No	Banning
4N30	N33 57 00.46	W116 58 24.51	2660.9	130	2760.9	No	No	Banning
4530	N33 56 56.96	W116 58 26.51	2660	142	2803	No	No	Banning
4N31	N33 57 00.42	W116 58 36.17	2642.9	129.6	2772.5	No	No	Banning
4531	N33 56 59.93	W116 58 36.18	2643.4	127.6	2771	No	No	Banning
4N32	N33 57 00.40	W116 58 47.01	2624.5	155.6	2784.1	No	No	Banning
4532	N33 56 59.90	W116 58 47.04	2623.7	155.6	2783.3	No	No	Banning
4534	N33 56 59.40	W116 59 01.01	2616.2	155	2781.2	No	No	Banning
4N34	N33 57 00.39	W116 59 01.00	2625.4	155	2780.4	No	No	Banning
4N35	N33 57 03.24	W116 59 14.07	2580.6	159.6	2760.2	No	No	Banning
4535	N33 57 02.76	W116 59 14.23	2579.7	179.6	2759.3	No	No	Banning
4N36	N33 57 05.78	W116 59 23.66	2608.7	135.6	2744.3	No	No	Banning
4536	N33 57 05.31	W116 59 23.64	2612.4	126.6	2739	No	No	Banning
4N37	N33 57 09.16	W116 59 37.24	2597.6	174.6	2772.2	No	No	Banning
4537	N33 57 08.68	W116 59 37.41	2592.3	174.6	2766.9	No	No	Banning
4N38	N33 57 12.21	W116 59 53.70	2584.4	174.6	2759	No	No	Banning
4539	N33 57 12.74	W116 59 53.86	2583.3	174.6	2757.9	No	No	Banning
4N39	N33 57 16.63	W117 00 07.60	2565.9	135.6	2701.5	No	No	Banning
4539	N33 57 16.16	W117 00 07.77	2565.5	138.6	2704.1	No	No	Banning
4N40	N33 57 19.82	W117 00 16.46	2564.7	126.6	2691.3	No	No	Banning
4540	N33 57 18.34	W117 00 16.63	2564.3	120.6	2684.7	No	No	Banning
4N41	N33 57 21.70	W117 00 28.15	2556	151.6	2709.4	No	No	Banning
4541	N33 57 21.22	W117 00 28.32	2555.3	154.6	2711.9	No	No	Banning
4N42	N33 57 25.36	W117 00 43.05	2535.1	150.6	2685.7	No	No	Banning
4542	N33 57 24.89	W117 00 43.22	2532.5	153.6	2686.1	No	No	Banning
4N43	N33 57 28.56	W117 00 55.98	2519.4	161.6	2681	No	No	Banning
4543	N33 57 28.05	W117 00 56.15	2518.8	174.6	2681.4	No	No	Banning
4N44	N33 57 32.14	W117 01 11.30	2493.6	155	2648.6	No	No	Banning
4544	N33 57 31.55	W117 01 11.43	2493.8	149	2642.8	No	No	Banning
4N45	N33 57 34.87	W117 01 26.92	2466	155	2621	No	No	Banning
4545	N33 57 34.78	W117 01 27.06	2466.8	155	2621.8	No	No	Banning
4N46	N33 57 37.34	W117 01 40.82	2447.6	144.6	2587.2	No	No	Banning
4546	N33 57 36.86	W117 01 40.94	2442.5	153.6	2596.1	No	No	Banning
4N47	N33 57 38.95	W117 01 50.31	2423.8	158.6	2583.4	No	No	Banning
4547	N33 57 38.47	W117 01 50.44	2416	156.6	2572.6	No	No	Banning
4N48	N33 57 42.24	W117 02 01.08	2409.5	179.6	2583.1	No	No	Banning
4548	N33 57 40.79	W117 02 01.18	2403.4	179.6	2583	No	No	Banning
4N50	N33 57 44.54	W117 02 22.57	2371.8	174.6	2546.4	No	No	Banning
4550	N33 57 44.06	W117 02 22.68	2378.6	174.6	2553.2	No	No	Banning
4N51	N33 57 46.79	W117 02 35.48	2359.9	174.6	2534.5	No	No	Banning
4551	N33 57 46.31	W117 02 35.61	2348.2	154.6	2524.8	No	No	Banning
4N52	N33 57 48.10	W117 02 43.46	2346.2	138.6	2521.2	No	No	Banning
4552	N33 57 47.62	W117 02 43.59	2372.4	135.6	2508	No	No	Banning
4N53	N33 57 49.61	W117 02 52.06	2380.8	145	2525.8	No	No	Banning
4553	N33 57 49.08	W117 02 52.20	2374.3	145	2519.3	No	No	Banning
4N54	N33 57 51.67	W117 03 04.53	2421.5	151.6	2571.1	No	No	Banning
4554	N33 57 51.19	W117 03 04.67	2428.7	151.6	2582.3	No	No	Banning
4N55	N33 57 53.88	W117 03 17.57	2421	157	2578	No	No	Banning
4555	N33 57 53.30	W117 03 17.99	2417.7	148	2565.7	No	No	Banning
4N56	N33 57 56.20	W117 03 30.29	2389.2	175.6	2563.7	No	No	Banning
4556	N33 57 55.37	W117 03 30.70	2375.5	128	2545.5	No	No	Banning

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4557	N33 57 58.14	W117 03 37.72	2384.7	128	2512.7	No	No	Banning		
4N57	N33 57 59.32	W117 03 37.87	2403	119	2522	No	No	Banning		
4N58	N33 57 59.85	W117 03 44.57	2360.1	125	2485.1	No	No	Banning		
4558	N33 57 57.32	W117 03 51.87	2339.7	139	2478.7	No	No	Banning		
4N59	N33 58 02.42	W117 03 54.54	2127.5	125	2252.5	No	No	Banning		
4559	N33 57 55.89	W117 04 00.78	2225.1	147	2372.1	No	No	Banning		
4N60	N33 58 05.05	W117 04 06.30	2076.3	135.6	2211.9	No	No	Banning		
4560	N33 57 54.28	W117 04 10.82	2095.4	175	2270.4	No	No	Banning		
4N61	N33 58 07.80	W117 04 16.68	2066.6	141.6	2208.2	No	No	Banning		
4N62	N33 58 10.57	W117 04 26.26	2068.6	125	2193.6	No	No	Banning		
4N63	N33 58 07.69	W117 04 34.86	2043.1	134	2177.1	No	No	Banning		
4N65	N33 58 04.43	W117 04 37.52	2055	132.3	2187.3	No	No	Banning		
4N64	N33 58 06.20	W117 04 39.39	2045.8	134	2179.8	No	No	Banning		



Comment Set F4 – Southern California Edison (cont.)

Structure ID	Latitude (NAD83)	Longitude (NAD83)	Site Elevation (ASL)	Structure Height (ASL)	Total Height (ASL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
SN01	N33 55 58.72	W116 43 17.94	1664	137	1801	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN02	N33 55 58.21	W116 43 17.94	1661	136	1798	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN03	N33 55 58.81	W116 43 28.86	1661	132	1793	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN02	N33 55 58.26	W116 43 28.86	1658	134	1792	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN03	N33 55 58.87	W116 43 31.38	1642	152	1794	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN03	N33 55 58.31	W116 43 41.38	1640	155	1795	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN04	N33 55 58.86	W116 43 54.95	1669	151	1820	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN04	N33 55 58.31	W116 43 54.95	1667	153	1820	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN05	N33 55 58.87	W116 44 08.56	1685	150	1835	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN05	N33 55 58.31	W116 44 08.56	1682	154	1837	No	No	Banning	No Filing Required-But Recommended-Airspace Issues	
SN06	N33 55 58.21	W116 44 20.51	1704	137	1841	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN06	N33 55 58.77	W116 44 20.52	1706	134	1840	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN07	N33 55 58.68	W116 44 32.26	1696	189	1885	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN07	N33 55 58.12	W116 44 32.26	1692	192	1884	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN08	N33 55 58.07	W116 44 42.77	1815	157	1972	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN08	N33 55 58.62	W116 44 42.78	1824	158	1981	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN09	N33 55 58.74	W116 44 52.94	1817	163	1981	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN09	N33 55 58.18	W116 44 52.94	1817	163	1980	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN10	N33 55 58.22	W116 45 02.75	1867	134	2000	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN10	N33 55 58.73	W116 45 02.76	1867	133	2000	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN11	N33 55 58.83	W116 45 17.22	1862	149	2012	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN11	N33 55 58.28	W116 45 17.54	1859	153	2013	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN12	N33 55 58.29	W116 45 31.50	1837	142	1979	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN12	N33 55 58.84	W116 45 31.51	1839	142	1981	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN13	N33 55 58.78	W116 45 43.52	1853	165	2018	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN13	N33 55 58.23	W116 45 43.52	1851	165	2016	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN14	N33 55 58.18	W116 46 00.96	1925	158	2083	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN14	N33 55 58.74	W116 46 00.97	1938	165	2103	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN15	N33 55 58.03	W116 46 15.40	1914	187	2101	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN15	N33 55 58.59	W116 46 15.41	1916	187	2103	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN16	N33 55 57.73	W116 46 29.64	1955	167	2122	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN16	N33 55 58.30	W116 46 29.69	1956	166	2122	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN17	N33 55 57.08	W116 46 43.73	2000	154	2154	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN17	N33 55 57.64	W116 46 43.77	2001	155	2156	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN18	N33 55 56.35	W116 46 58.95	2052	155	2207	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN18	N33 55 56.90	W116 46 59.12	2054	155	2209	No	No	Banning	Potential Approach	No Filing Required-But Recommended-Airspace Issues
SN19	N33 55 55.56	W116 47 15.23	2101	183	2283	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN19	N33 55 56.12	W116 47 15.29	2104	181	2285	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN20	N33 55 56.21	W116 47 30.47	2134	152	2286	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN20	N33 55 55.77	W116 47 30.49	2137	152	2289	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN21	N33 55 55.67	W116 47 41.73	2146	155	2300	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN21	N33 55 55.11	W116 47 41.73	2143	155	2298	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN22	N33 55 55.68	W116 47 57.59	2164	181	2344	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN22	N33 55 55.12	W116 47 57.59	2161	182	2343	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN23	N33 55 55.70	W116 48 14.66	2167	186	2348	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN23	N33 55 55.15	W116 48 14.66	2167	185	2341	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN24	N33 55 55.73	W116 48 32.31	2147	181	2328	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN24	N33 55 55.17	W116 48 32.31	2145	182	2327	Yes	No	Banning	Requires Filing - No Airspace Issues	
SN27	N33 55 55.76	W116 48 50.02	2292	181	2274	Yes	No	Banning	Requires Filing - No Airspace Issues	

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Comment Set F4 – Southern California Edison (cont.)

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (ASL)	Total Height (ASL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
5527	N33 55 55.20	W116 48 50.02	2091	181	2272	Yes	No	Banning		Requires Filing - No Airspace Issues
5528	N33 55 55.20	W116 49 03.05	2086	140	2225	Yes	No	Banning		Requires Filing - No Airspace Issues
5N28	N33 55 55.76	W116 49 03.06	2086	139	2225	Yes	No	Banning		Requires Filing - No Airspace Issues
5N29	N33 55 55.82	W116 49 16.87	2069	140	2208	Yes	No	Banning		Requires Filing - No Airspace Issues
5529	N33 55 55.29	W116 49 17.11	2066	140	2206	Yes	No	Banning		Requires Filing - No Airspace Issues
5N30	N33 56 01.93	W116 49 26.22	2087	157	2244	Yes	No	Banning		Requires Filing - No Airspace Issues
5530	N33 56 01.39	W116 49 26.44	2085	154	2239	Yes	No	Banning		Requires Filing - No Airspace Issues
5531	N33 56 01.26	W116 49 34.77	2091	123	2214	Yes	No	Banning		Requires Filing - No Airspace Issues
5N31	N33 56 01.83	W116 49 34.78	2093	123	2216	Yes	No	Banning		Requires Filing - No Airspace Issues
5532	N33 56 01.15	W116 49 43.69	2098	118	2216	Yes	No	Banning		Requires Filing - No Airspace Issues
5N32	N33 56 01.69	W116 49 43.71	2100	118	2218	Yes	No	Banning		Requires Filing - No Airspace Issues
5534	N33 56 01.00	W116 49 52.65	2106	123	2229	Yes	No	Banning		Requires Filing - No Airspace Issues
5N34	N33 56 01.55	W116 49 52.66	2106	123	2229	Yes	No	Banning		Requires Filing - No Airspace Issues
5535	N33 56 00.89	W116 50 04.53	2128	123	2251	Yes	No	Banning		Requires Filing - No Airspace Issues
5N35	N33 56 01.43	W116 50 04.54	2130	123	2253	Yes	No	Banning		Requires Filing - No Airspace Issues
5N36	N33 56 01.42	W116 50 13.05	2145	123	2268	Yes	No	Banning		Requires Filing - No Airspace Issues
5536	N33 56 00.88	W116 50 13.05	2143	123	2266	Yes	No	Banning		Requires Filing - No Airspace Issues
5N37	N33 56 01.41	W116 50 21.87	2164	118	2282	Yes	No	Banning		Requires Filing - No Airspace Issues
5537	N33 56 00.87	W116 50 21.87	2162	118	2280	Yes	No	Banning		Requires Filing - No Airspace Issues
5N38	N33 56 01.58	W116 50 30.35	2184	118	2302	Yes	No	Banning		Requires Filing - No Airspace Issues
5538	N33 56 00.86	W116 50 30.35	2185	118	2303	Yes	No	Banning		Requires Filing - No Airspace Issues
5N39	N33 56 01.52	W116 50 38.31	2207	113	2320	Yes	No	Banning		Requires Filing - No Airspace Issues
5539	N33 56 00.98	W116 50 38.32	2207	113	2320	Yes	No	Banning		Requires Filing - No Airspace Issues
5N40	N33 56 01.64	W116 50 46.14	2226	118	2344	Yes	No	Banning		Requires Filing - No Airspace Issues
5540	N33 56 01.10	W116 50 46.15	2226	118	2344	Yes	No	Banning		Requires Filing - No Airspace Issues
5N41	N33 56 01.77	W116 50 53.98	2247	118	2365	Yes	No	Banning		Requires Filing - No Airspace Issues
5541	N33 56 01.22	W116 50 53.99	2246	118	2364	Yes	No	Banning		Requires Filing - No Airspace Issues
5N42	N33 56 01.89	W116 51 03.01	2269	118	2387	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5542	N33 56 01.34	W116 51 03.81	2267	118	2385	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5N43	N33 56 01.88	W116 51 08.78	2286	113	2399	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5543	N33 56 01.34	W116 51 09.09	2285	113	2398	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5N44	N33 56 06.15	W116 51 13.04	2312	113	2425	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5544	N33 56 05.81	W116 51 13.55	2312	113	2425	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5N44A	N33 56 10.85	W116 51 17.74	2336	118	2454	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5444A	N33 56 10.61	W116 51 18.25	2336	118	2454	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5N45	N33 56 15.61	W116 51 22.51	2361	118	2479	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5545	N33 56 15.26	W116 51 23.01	2361	118	2479	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N46	N33 56 20.36	W116 51 27.28	2384	123	2507	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5546	N33 56 20.02	W116 51 27.78	2385	123	2508	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N47	N33 56 25.15	W116 51 32.07	2411	133	2544	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5547	N33 56 24.83	W116 51 32.60	2412	133	2545	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N48	N33 56 31.23	W116 51 37.74	2445	166	2612	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5548	N33 56 30.88	W116 51 38.26	2446	163	2609	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N49	N33 56 38.58	W116 51 44.63	2474	184	2658	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5549	N33 56 38.14	W116 51 45.06	2475	183	2658	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N52	N33 56 48.96	W116 52 07.80	2587	182	2769	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
5552	N33 56 48.42	W116 52 08.00	2587	182	2769	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
5554	N33 56 49.67	W116 52 29.24	2640	178	2818	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
5N54	N33 56 50.15	W116 52 29.30	2640	178	2818	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues

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cont.

Comment Set 4 – Southern California Edison (cont.)

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (ASL)	Total Height (ASL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
0607	N13°15' 16.54"	W113°36' 43.13"	1267	188	1455	Yes	Yes	Devers West Springs		
0608	N13°55' 58.71"	W113°36' 48.79"	1267	188	1455	Yes	Yes	North-Pulse Springs		
0609	N13°55' 56.71"	W113°36' 54.77"	1271	188	1459	Yes	Yes	North-Pulse Springs		
0610	N13°55' 56.26"	W113°36' 51.47"	1268	188	1456	Yes	Yes	North-Pulse Springs		
0611	N13°55' 56.23"	W113°36' 57.17"	1268	188	1456	Yes	Yes	North-Pulse Springs		
0612	N13°55' 56.22"	W113°36' 58.97"	1218	143	1361	Yes	Yes	North-Pulse Springs		
0613	N13°55' 56.19"	W113°36' 50.79"	1215	147	1362	Yes	Yes	North-Pulse Springs		
0614	N13°55' 56.17"	W113°36' 47.49"	1218	143	1361	Yes	Yes	North-Pulse Springs		
0615	N13°55' 57.91"	W113°36' 48.61"	1240	156	1427	Yes	Yes	North-Pulse Springs		
0616	N13°55' 57.61"	W113°36' 53.55"	1170	143	1313	Yes	Yes	White Station		
0617	N13°55' 57.40"	W113°36' 49.59"	1260	156	1416	Yes	Yes	White Station		
0618	N13°55' 57.61"	W113°36' 25.74"	1248	148	1396	Yes	Yes	White Station		
0619	N13°55' 57.70"	W113°36' 31.50"	1295	151	1446	Yes	Yes	White Station		
0620	N13°55' 57.71"	W113°36' 48.81"	1249	152	1401	Yes	Yes	White Station		
0621	N13°55' 57.65"	W113°36' 51.17"	1272	156	1428	Yes	Yes	White Station		
0622	N13°55' 57.58"	W113°37' 09.13"	1308	155	1463	Yes	Yes	White Station		
0623	N13°55' 57.50"	W113°37' 14.21"	1343	142	1485	Yes	Yes	White Station		
0624	N13°55' 57.53"	W113°37' 24.24"	1415	145	1560	Yes	Yes	White Station		
0625	N13°55' 57.41"	W113°37' 35.54"	1337	156	1493	Yes	Yes	White Station		
0626	N13°55' 59.41"	W113°37' 49.40"	2015	147	2162	Yes	Yes	White Station		
0627	N13°55' 56.41"	W113°38' 25.26"	1387	183	1570	Yes	Yes	White Station		
0628	N13°55' 53.13"	W113°38' 49.53"	2031	131	2162	Yes	Yes	White Station		
0629	N13°55' 51.91"	W113°39' 22.45"	2037	129	2166	Yes	Yes	White Station		
0630	N13°55' 51.45"	W113°39' 25.41"	2028	129	2157	Yes	Yes	White Station		
0631	N13°55' 50.43"	W113°39' 42.10"	1821	158	1979	Yes	Yes	White Station		
0632	N13°55' 52.77"	W113°40'06.10"	1515	176	1691	Yes	Yes	White Station		
0634	N13°55' 52.71"	W113°40' 24.82"	1478	166	1644	Yes	Yes	White Station		
0635	N13°55' 52.81"	W113°40' 43.77"	1477	188	1665	Yes	Yes	White Station		
0637	N13°55' 52.83"	W113°41'01.90"	1529	150	1679	Yes	Yes	White Station		
0638	N13°55' 51.28"	W113°42' 19.07"	1498	140	1638	Yes	Yes	White Station		
0639	N13°55' 53.56"	W113°42' 27.40"	1495	130	1625	Yes	Yes	White Station		
0640	N13°55' 53.50"	W113°42' 40.90"	1479	147	1626	Yes	Yes	White Station		
0641	N13°55' 54.10"	W113°42' 47.44"	1469	130	1600	Yes	Yes	White Station		
0642	N13°55' 54.75"	W113°42' 56.75"	1484	137	1621	Yes	Yes	White Station		
0643	N13°55' 55.11"	W113°43' 07.80"	1515	143	1658	Yes	Yes	White Station		
0644	N13°55' 55.27"	W113°42' 18.08"	1570	148	1718	Yes	Yes	White Station		
0645	N13°55' 55.74"	W113°42' 25.43"	1560	150	1710	Yes	Yes	White Station		
0646	N13°55' 56.49"	W113°42' 42.07"	1625	183	1808	Yes	Yes	White Station		
0647	N13°55' 58.43"	W113°42' 53.59"	1640	192	1832	Yes	Yes	White Station		
0648	N13°55' 58.60"	W113°43'06.30"	1617	213	1830	Yes	Yes	White Station		
0629	N13°55' 59.96"	W113°43' 44.14"	1760	188	1948	Yes	Yes	Devers West Springs		
0608	N13°55' 58.12"	W113°44' 44.14"	1760	188	1948	Yes	Yes	North-Pulse Springs		
0609	N13°56' 58.00"	W113°49' 53.81"	2074	192	2266	Yes	Yes	North-Pulse Springs		
0650	N13°55' 59.67"	W113°44' 55.01"	1765	194	1959	Yes	Yes	North-Pulse Springs		
0651	N13°55' 59.44"	W113°45' 07.13"	1765	149	1914	Yes	Yes	North-Pulse Springs		
0652	N13°55' 59.63"	W113°45' 18.57"	1718	142	1860	Yes	Yes	North-Pulse Springs		
0653	N13°55' 59.60"	W113°45' 30.79"	1710	148	1858	Yes	Yes	North-Pulse Springs		
0654	N13°55' 59.57"	W113°45' 41.82"	1716	137	1853	Yes	Yes	North-Pulse Springs		
0655	N13°55' 53.49"	W113°45' 48.84"	1722	155	1877	Yes	Yes	North-Pulse Springs		
0656	N13°55' 53.46"	W113°45' 57.46"	1716	148	1864	Yes	Yes	White Station		
0657	N13°55' 54.34"	W113°46' 01.00"	1717	142	1864	Yes	Yes	White Station		

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 Cont.

Comment Set F4 – Southern California Edison (cont.)

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (MGS)	Total Height (MMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
6518	N33 55 54.79	W116 36 71.71	1243	131	41933	No	No	White Water		
6519	N33 55 55.24	W116 36 32.91	1283	137	42578	No	No	White Water		
6520	N33 55 55.61	W116 36 43.42	1379	153	43190	No	No	White Water		
6521	N33 55 56.11	W116 36 54.09	1368	154	43831	No	No	White Water		
6522	N33 55 56.10	W116 37 04.35	1420	138	44419	No	No	White Water		
6523	N33 55 56.12	W116 37 14.27	1436	136	44996	No	No	White Water		
6524	N33 55 56.11	W116 37 23.68	1409	164	45553	No	No	White Water		
6525	N33 55 54.12	W116 37 35.34	1537	163	46111	No	No	White Water		
6526	N33 55 52.70	W116 37 46.60	1592	171	46664	No	No	White Water		
6527	N33 55 50.11	W116 37 58.86	1673	157	47282	No	No	White Water		
6528	N33 55 45.33	W116 38 40.87	1858	191	49661	No	No	White Water		
6528A	N33 55 42.62	W116 38 55.69	1768	180	51097	No	No	White Water		
6529	N33 55 38.31	W116 39 0.16	1429	181	51454	No	No	White Water		
6530	N33 55 36.20	W116 39 20.37	1365	122	52346	No	No	White Water		
6530A	N33 55 37.26	W116 39 29.14	1341	153	53203	No	No	White Water		
6531	N33 55 38.82	W116 39 38.08	1314	187	53675	No	No	White Water		
6531A	N33 55 39.40	W116 39 48.39	1295	180	54444	No	No	White Water		
6532	N33 55 40.96	W116 40 00.31	1359	164	53447	No	No	White Water		
6533	N33 55 47.44	W116 40 12.61	1361	153	52417	No	No	White Water		
6534	N33 55 43.92	W116 40 25.05	1395	142	51376	No	No	White Water		
6535	N33 55 45.56	W116 40 38.79	1361	165	50227	No	No	White Water		
6536	N33 55 46.89	W116 40 52.85	1382	182	49068	No	No	White Water		
6537	N33 55 48.72	W116 41 5.42	1447	161	48023	No	No	White Water		
6538	N33 55 49.78	W116 41 14.15	1477	182	47275	No	No	White Water		
6539	N33 55 49.16	W116 41 29.81	1467	181	49954	No	No	White Water		
6540	N33 55 49.02	W116 41 39.71	1452	165	45121	No	No	White Water		
6541	N33 55 48.62	W116 41 53.17	1451	130	43986	No	No	White Water		
6542	N33 55 54.21	W116 41 58.03	1484	120	43617	No	No	White Water		
6543	N33 55 54.56	W116 42 7.37	1511	144	42835	No	No	White Water		
6544	N33 55 54.62	W116 42 18.11	1536	149	41934	No	No	White Water		
6545	N33 55 55.19	W116 42 25.69	1558	151	40089	No	No	White Water		
6546	N33 55 56.34	W116 42 40.13	1601	164	40100	No	No	White Water		
6547	N33 55 57.75	W116 42 53.65	1639	182	38978	No	No	White Water		
6548	N33 55 58.09	W116 43 06.28	1654	163	37922	No	No	White Water		

#### Responses to SCE Comments Related to Project Description Changes (Comment Set F4)

F4-1 The commenter has attached a revised Table B-1 (Typical Transmission Structure Dimensions) and Table B-2 (Transmission 220 kV Removal and Installation Per Segment). These suggested modifications have been made to the Final EIS, as addressed in Responses to Comments F3-41, F3-42, F3-43, F3-45 and F3-46.

F4-2 The commenter has provided information on a new Match Material and Equipment Staging Area that would be used in the event that one of the other proposed yards is occupied and unavailable prior to SCE commencing with construction. Table B-5 (Potential Staging Yard Locations) and Table B-6 (Potential Staging Yard Approximate Land Disturbance) have been updated to add the Match Material and Equipment Staging Area, as also addressed in Response to Comment F3-63.

Analysis of the Match Material and Equipment Staging Area has been incorporated into each environmental discipline in Section D, as applicable. Given that the Match Material and Equipment Staging Area is previously disturbed, would be used temporarily during construction, is in the same general area as the Hathaway #1 and #2 Yards, and has historically been used as a material and staging yard, no new or more substantial impacts than those identified in the Draft EIR/EIS would occur.

F4-3 The commenter has provided a revised Figure B-16 (Proposed Staging Yard Locations). Therefore, Figure B-16 has been updated in the Final EIS to add the Match Material and Equipment Staging Area, as is also addressed in Responses to Comments F3-63 and F4-2.

F4-4 The commenter has submitted as an attachment the following updated figures:

- Figure B-2b (Existing and Proposed Corridor Profile – Segment 1),
- Figure B-3b (Existing and Proposed Corridor Profile – Segment 2),
- Figure B-4b (Existing and Proposed Corridor Profile – Segment 3),
- Figure B-5b (Existing and Proposed Corridor Profile – Segment 4),
- Figure B-6b (Existing and Proposed Corridor Profile – Segment 5),
- Figure B-6c (Existing and Proposed Corridor Profile – Segment 5), and
- Figure B-7b (Existing and Proposed Corridor Profile – Segment 6).

As requested, these seven updated figures have been incorporated into Section B (Description of the Proposed Project) of the Final EIS.

F4-5 The commenter has provided a revised Figure B-10 (Typical 220 kV Transmission Structures). Therefore, Figure B-10 has been updated in Section B (Description of the Proposed Project) of the Final EIS, as also addressed in Response to Comment F3-84.

F4-6 The commenter has provided an updated Table Ap.1A-1 (Structure Heights), as is also addressed in Comment F3-574. As requested, Table Ap.1A-1 has been updated in Appendix 1 (Project Description Information) of the Final EIS.

F4-7 The commenter has provided an updated Table Ap.1B-1 (FAA Hazard Marking Evaluation) from Appendix 1, as is also addressed in Comment F3-575. As requested, Table Ap.1B-1 has been updated in Appendix 1 (Project Description Information) of the Final EIS.

F4-8 The commenter has provided updated data for Tables Ap.1B-2 to Ap.1B-7 (Preliminary FAA Evaluation), as are also addressed in Comment F3-576. As requested, Tables Ap.1B-2 to Ap.1B-7 have been updated in Appendix 1 (Project Description Information) of the Final EIS.

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